

# LYCÉE INTERNATIONAL DE LONDRES WINSTON CHURCHILL

("the School")

## Policy #6: Policy and Procedures for Safeguarding and Child Protection

Latest update: June 2025

### Our Mission

Through a rigorous, bilingual programme and innovative methods, we educate students to become responsible, creative, and principled global citizens. We teach them to think critically and act ethically, to form and express their own opinions and respect those of others, to define their own life goals, and to make sense of and embrace change.

Our values are: Excellence, Creativity, Integrity, Awareness and Community.

In support of these aims and values we are committed to ensuring the following:

### Introduction

We are committed to treating all our students with respect and dignity.

### Summary of changes - May 2025

The model policy has been revised to reflect these changes to the statutory guidance as outlined below.

Section	Changes
whole document	June 2025 Review of changes made to document in Autumn 2024 Update to all key contacts in police and local authority Review of information in definitions and symptoms of abuse Review of whistle-blowing and allegations against staff and volunteers  Summary of changes introduced by Keeping children safe in education - updates from 2024:

<https://learning.nspcc.org.uk/media/jvzhssj3/kcsie-2024-update.pdf>

All references to 'Keeping Children Safe in Education' 2023 have been removed and replaced with reference to 'Keeping Children Safe in Education' 2024. Key changes in KCSIE 2024 are:

- amending the definition of 'safeguarding and promoting the welfare of children' in line with 'Working Together to Safeguard Children' 2023
- additional information around when children may require early help, in accordance with the guidance in 'Working Together to Safeguard Children' 2023
- a recommendation for school staff, governors and trustees to use the DfE Data Protection guidance for schools to understand data protection
- clarification that schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider.

References (From NSPCC):

<https://learning.nspcc.org.uk/research-resources/schools/keeping-children-safe-in-education-caspar-briefing>

1. Department for Education (DfE) (2024) Keeping children safe in education 2024: statutory guidance for schools and colleges (PDF). London: Department for Education.

2. Department for Education (DfE) (2023) Working together to safeguard children: a guide to multi-agency working to help, protect and promote the welfare of children. [Accessed 03/09/2024].

3. Department for Education (DfE) (2024) Data protection in schools [Accessed 03/09/2024].

KCSIE : Part one Safeguarding information for all staff Paragraph 13 Updated link to Behaviour in schools' guidance.

Update to Local Authority contacts

3. Terminology: update to definition of Safeguarding as in KCSIE 2024

Paragraph 14 New text added to raise awareness of the existing expectation for relevant staff to understand filtering and monitoring.

Part two The management of safeguarding Para 103 Added reference to filtering and monitoring.

Paragraph 124 New text added to make clear staff training should include understanding roles and responsibilities in relation to filtering and monitoring.

Paragraph 138 Reference to child protection policies and appropriate filtering and monitoring on school devices and school networks. Paragraph 142 Added new section referencing the new published filtering and monitoring standards.

The standards are to support schools to meet their duty to have appropriate/effective filtering and monitoring systems in place, this is not a new burden.

Paragraph 144 Reference to cyber security standards.

Paragraphs 167 Updated to reference Keeping children safe in out-of-school settings.

Paragraph 175 Clarification provided on the difference between children missing education and children absent from education.

Paragraph 202 Additional signpost to specialist organisations for children with special educational needs and disabilities.

Part three Safer recruitment

	<p>Footnote 221 Clarification that it is good practice for schools to inform shortlisted candidates that online searches will be carried out</p> <p>Part four Allegations/concerns New heading and paragraph Organisations or individuals using school premises.</p> <p>Part five Child-on-child sexual violence and sexual harassment Throughout the guidance Revised to reflect wording in behaviour guidance.</p> <p>Annex A Safeguarding information for school and college staff Revised to reflect changes in Part one</p> <p>Annex B Further information Children absent from education Revised to reflect the difference between children absent from education and children missing education.</p> <p>Forced Marriage Reflects change in law from February 2023</p> <p>Child Exploitation New reference to multi-agency practice principles</p>
policy statement	<p>Amended to meet guidance regarding</p> <ul style="list-style-type: none"> <li>• <u>Keeping Children Safe in Out of School Settings</u> for non-school activity providers( (see paragraph KCSIE 167)</li> <li>• any conduct whose purpose is to cause a child to marry before their eighteenth birthday</li> </ul>

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**Appendix 1:What to do if a child approaches you to discuss allegations of abuse**

**Appendix 2: School Code of behaviour for all staff and volunteers**

**Appendix 3: Concern form**

**Useful Contacts/ Resources/ Legislation**

## 1. Key staff contacts

### **Designated Safeguarding Lead:**

Bradley Eaton:

safeguarding@lyceeinternational.london

Tel: +44(0)20 3824 4915

**DDSL:** Jean-Baptiste Gamain, Head of Pastoral Care and Student Wellbeing:

dhpastoral@lyceeinternational.london

Tel: +44(0)20 3824 4923

**DDSL:** Laetitia Pavia, Deputy Head of Pastoral:

studentlife@lyceeinternational.london

Tel: +44(0)20 3824 4920

**Safeguarding Governor:** Mike Penrose: safeguardinggov@lyceeinternational.london

### **Deputy Designated Safeguarding Leads / Heads of Years:**

**Deputy DSL:** Head of Primary including EYFS: Minisha Bist

directeurprimaire@lyceeinternational.london

Tel: +44 (0)20 3824 4931

**Deputy DSL:** Head of Early years: Neil Hooley

**Deputy DSL:** Head of Primary GS-CP (Year 1-2): Karolina Jarzyna

**Deputy DSL:** Head of Primary CE1-CE2 (Year 3-4): Christina Rebello

**Deputy DSL:** Head of Primary CM1-CM2 (Year 5-6): Aliya Faruqi

**Deputy DSL:** Head of Secondary: Julien Astruc

headofsecondary@lyceeinternational.london

Tel: +44(0)20 3824 4917

**Deputy DSL:** Head of Year 8/9/5eme/4eme: Darielly Castillo Whight

**Deputy DSL:** Head of Year 10/3eme: Benoît Gschwind

**Deputy DSL:** Head of year 11: Eddy Labidi

**Deputy DSL:** Head of Year 12/ 1ere: John Richardson

**Deputy DSL:** Head of Year 13/ Tle: Aljaž Tirić

**School Mental Health Lead:** John Richardson

**Looked After Children Lead:** Bradley Eaton

### **Safeguarding Board Committee:**

Mike Penrose (Governor)

Mireille Rabaté, Laurent Batut, Bradley Eaton (Senior Leaders)

safeguardinggov@lyceeinternational.london

## 2. Key Local Authority Contacts

	Name	Telephone	Email
Brent Children's Social Care / Early Help Assessment referral Brent Civic Centre, Engineers Way, Wembley HA9 0FJ	Duty Officer	Monday-Friday 9am-5pm Brent Family Front Door 020 8937 4300 Emergency Out of Hours Duty Team 020 8863 5250 MASH Consultation Line 0208 937 2228	<a href="mailto:Family.Frontdoor@brent.gcsx.gov.uk">Family.Frontdoor@brent.gcsx.gov.uk</a>
Brent student Protection Advisor Brent Civic Centre, Engineers Way, Wembley HA9 0FJ	Duty Officer	020 8937 4305	<a href="mailto:NWMailbox.Schools.Brent@met.police.uk">NWMailbox.Schools.Brent@met.police.uk</a>
Met Police - Brent, Barnet and Harrow BCU Child Abuse Investigation Team (CAIT) Grahame Park Way, London, NW9 5TW	DI Matt Dumpleton  DCI Dave La Riviere	020 8733 3562 (Phone) 020 8733 3589 (Fax) Any Time	<a href="mailto:NWMailbox.CAITReferralsBrent@met.police.uk">NWMailbox.CAITReferralsBrent@met.police.uk</a>  <a href="mailto:Matthew.Dumpleton@met.police.uk">Matthew.Dumpleton@met.police.uk</a>
Safer schools liaison officer ( LIL) Wembley Police Station 603 Harrow Rd, Wembley HA0 2HH	Safer schools officer : Yu Zhang	020 7230 1212	<a href="mailto:Yu.Zhang2@met.police.uk">Yu.Zhang2@met.police.uk</a>  <a href="mailto:p230777@met.pnn.police.uk">p230777@met.pnn.police.uk</a>  <a href="mailto:NW-SchoolsBrent@met.police.uk">NW-SchoolsBrent@met.police.uk</a>
The Child Exploitation and Online Protection Centre(CEOP) 33 Vauxhall Bridge Road London SW1V 2WG	Duty Officer	09:00 till 17:00, Monday to Fridays. 0870 000 3344	
Brent Safeguarding Children's Forum Strategic Partnership Manager Brent Civic Centre, Engineers Way, Wembley HA9 0FJ	Zoe Tattersall	020 8937 1667	<a href="mailto:Zoe.tattersall@brent.gov.uk">Zoe.tattersall@brent.gov.uk</a>
Head of Inclusion  Head Teacher of Virtual School: (any	Dr Roxana Glennon  Michaela Richards	020 8397 2785  020 8397 1075	<a href="mailto:Roxanna.glennon@brent.gov.uk">Roxanna.glennon@brent.gov.uk</a>

attendance/ inclusion concerns or queries and responsibility for Looked after or previously looked after Children).			<a href="mailto:Michaela.richards@brent.gov.uk">Michaela.richards@brent.gov.uk</a>
<b>Local Authority Designated Officer (LADO) for staff allegations. Brent Civic Centre, Engineers Way, Wembley HA9 0FJ</b>	<b>Florence Lyndsey-Walters</b>  <b>In case of Emergency call Sonya Kalyniak (Head of Safeguarding and QA) 07776664471</b>	<b>02089371949</b>  <b>Monday-Friday 9am-5pm Brent Family Front Door 020 8937 4300</b> <b>Emergency Out of Hours Duty Team 020 8863 5250</b>	<a href="mailto:Brent.LADO@Brent.gov.uk">Brent.LADO@Brent.gov.uk</a>  <a href="mailto:family.frontdoor@brent.gcsx.gov.uk">family.frontdoor@brent.gcsx.gov.uk</a>
<b>Prevent Strategy Manager, Brent Community Safety Team London Borough of Brent (Prevention of extremism)</b>	<b>Abu Ullah</b>	<b>020 8937 1562</b>	<a href="mailto:Abu.ullah@brent.gov.uk">Abu.ullah@brent.gov.uk</a>
Brent Education Welfare service for any students missing from education (liaise with Admissions on previous and future school placements through s2s platform)		<a href="https://www.brent.gov.uk/education-schools-and-learning/attendance-and-exclusions/education-welfare-service">https://www.brent.gov.uk/education-schools-and-learning/attendance-and-exclusions/education-welfare-service</a>	<a href="mailto:EWS.CME@brent.gov.uk">EWS.CME@brent.gov.uk</a>
The Brent Community Multi Agency Risk Assessment Conference (MARAC) is a process where professionals from agencies share information on cases of very vulnerable and high risk individuals whose personal safety is a concern		<a href="#">Referral form</a>	<a href="mailto:community.marac@brent.gov.uk">community.marac@brent.gov.uk</a>

### 3. Terminology

**Safeguarding** and promoting the welfare of children refers to providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. The school endeavours to

liaise with all previous and future schools regarding safeguarding issues.

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

**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.

**Child** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## 4. Policy Statement

Through a rigorous, bilingual programme and innovative methods, we educate students to become responsible, creative, and principled global citizens. We teach them to think critically and act ethically, to form and express their own opinions and respect those of others, to define their own life goals, and to make sense of and embrace change.

Our values are: Excellence, Creativity, Integrity, Awareness and Community.

In support of these aims and values we are committed to ensuring :

Safeguarding and Child Protection procedures and policies will follow the guidance of the ‘**Working Together to safeguard Children**’ (updated June 2024), the ‘**Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges**’ (KCSIE) September 2024<sup>1</sup> and **London Child Protection Procedures 2024**. This Policy is required under The Independent School Regulations 2015 Part 3 7(a)(b) and follows the Revised Prevent guidance 2021 and takes into account the following legislation:

- The Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty

Every adult in our school takes any welfare concerns seriously and encourages children and young people to talk to us about anything that worries them. We will always act in the best interest of the child. At Lycee International de Londres we are committed to safeguarding children and young people and we expect everyone who

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1161273/Keeping\\_children\\_safe\\_in\\_education\\_2023\\_-\\_statutory\\_guidance\\_for\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf)

works in our school to share this commitment. Our students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. The school curriculum is underpinned by the school's behaviour policy and pastoral support system and RSHE being delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Children are taught to recognise when they are at risk and how to get help when they need it. Examples are through discussion groups and assemblies with our local safer schools officers, letter boxes in primary, peer counselling service and training, Anti Bullying ambassadors, friendship buddies and Common sense media and Pix certification in years 9/ 3eme and Year13/ Terminale.

The Safeguarding and Child protection policy serves to uphold the school's mission and values.

Unless a difference between the primary and the secondary sections is stated any reference to the school refers to the whole school.

The staff at the School fully recognise their professional responsibilities for protection from harm to all children in our care. Our 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 abusive 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.
- the school assesses the risks and issues in the wider community when considering the well-being and safety of our students
- All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to

disclose. All staff will be trained to recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

- Where the school is used for non-school activities with children, those providers are expected to meet the guidance in [Keeping Children Safe in Out of School Settings](#) (see KCSIE paragraph 169)
- If the school receives allegations related to an incident that 'happened when an individual or organisation was using their school premises for the purposes of running activities for children the school will follow their safeguarding policies and procedures, including informing the LADO'. (see KCSIE paragraph 384)
- Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see KCSIE page 162)

The School is committed to equal treatment for all, regardless of an individual's race, sex, disability, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity. We believe that the educational experience can only be enriched if children are exposed to as wide a range of cultural experiences as possible whilst they are developing.

## 5. School Aims

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe for example through the Personal Social Health Education (PSHSE) curriculum, including the [2019 requirements](#) for relationship education, relationships and sex education and health education.
- Ensuring we practise safe recruitment, in accordance with the Disclosure and Barring Services check when checking the suitability of staff, teaching, administrative, and volunteers who work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
- Supporting students who have been abused in accordance with the agreed child protection plan.

## 6. Procedures

We will follow the procedures set out in London Child Protection Procedures, the Local Authority, the local safeguarding partnership arrangements ([here](#)) and Brent Family [Front Door](#) to take account of guidance issued by the Department for Education to establish:

- Duty of Care
- Definitions and symptoms of abuse
- Monitoring and Record keeping
- Disclosure and actions following a disclosure (child)
- Whistle-blowing
- Disclosure and actions following a disclosure (adult)
- Safer Recruitment

The three Brent safeguarding partners (Brent Council, Brent Clinical commissioning Group and the Police) began meeting as a collective in December 2017 to agree a response to the national consultation on Working Together 2022.

## 7. Duty of Care

- Ensure that all staff take responsibility for overseeing the Child Protection Policies and Procedures and that they are reviewed annually.
- Schools must keep at least two contact numbers for students.
- Ensure we have a designated senior person for child protection who has received appropriate training and support for this role, known as the Designated Safeguarding Lead (DSL)
- Ensure every member of staff (including temporary and supply staff and volunteers) knows the name of the designated senior person responsible for child protection and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for child protection.
- Ensure that staff induction includes student behaviour policy and response to children missing or absent from education.
- Ensure that parents and carers have an understanding of the responsibility placed on the school and staff for child protection by setting out its obligations in the school prospectus.
- Notify Children's Social Care if there is an unexplained absence of more than two days of a student who is subject of a child protection plan.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.

- Keep written records of concerns about students, even where there is no need to refer the matter immediately. (See appendix 2 for pastoral concern sheet).
- Ensure all records are kept securely; separate from the main student file, and in locked locations if paper copies are held.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure safe recruitment practices are always followed.

## **Duty of the Board of Governors**

The Board of Governors maintain continuous oversight of safeguarding. They have a named person responsible for safeguarding and meet as a named safeguarding committee. They review and update the policy annually to ensure that it is up to date with any emerging safeguarding issues. They commissioned an annual review which was last revisited in June 2023. Governors attend safeguarding training at induction and then at regular intervals to equip them to provide strategic challenges and ensure there is a robust whole school approach to safeguarding including online safety, filtering and monitoring.

## **Duty of the School**

To appoint a **Designated Safeguarding Lead (DSL)** to take responsibility for:

- Implementing the Child Protection Policy within the School
- Supporting other staff in their understanding of child protection issues and ability to recognise the signs and symptoms of abuse
- Managing the establishment's response to a disclosure of abuse
- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety, filtering and monitoring). This is explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post.
- Deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description.

To provide induction and training:

Every new member of staff, including part-timers, temporary, visiting and contract staff working in school, receives basic training (including online safety, filtering and monitoring) on their responsibilities in being alert to the signs of abuse and bullying and on the procedures for recording and referring any concerns to the DSL or the Head as well as working with different agencies.

This will be carried out by the Designated Safeguarding Lead or appointed Deputies. Training in child protection and safeguarding is an important part of the induction process. More detail is set out in our policy on Induction of New Staff and Volunteers in Child Protection and Safeguarding. All staff receive level 2 child protection training before taking up a position in the school. All DSL training is updated at 2 yearly intervals.

All staff are given annual safeguarding training on what to do if a child approaches them to discuss allegations of abuse (Appendix 1) and the Code of Behaviour - for All Staff and Volunteers (Appendix 2). All are also made aware of the pastoral care concern sheet (Appendix 3)-which can be completed on the Child protection online management system CPOMS - and **Keeping Children Safe in Education, Statutory Guidance for Schools and Colleges** (September 2024) and will be required to read and signed they have clearly understood the procedures in Part 1 and Annex B.

To support children:

We create a culture of value and respect for each individual, having positive regard for children's heritage arising from their colour, ethnicity, language, cultural and social background.

- We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.

The School will endeavour to support the student's mental and physical health through:

- The content of the curriculum.
- The school ethos, which promotes a positive, supportive and secure environment and gives students a sense of being valued.
- The school behaviour and anti-bullying policy, which is aimed at supporting vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the student such as social services, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- Ensuring that, where a student on the child protection register leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

- The school ensures that students are clear about what is expected of them online as offline by reference to the following resources and commitment to the Common Sense Education programme.
- The guidance 'Teaching online safety in school' (DfE, 2019, updated in January 2024) can be downloaded here:  
<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>
- Education for a Connected World (UKCIS, 2018, updated in 2020) can be downloaded here:  
<https://www.gov.uk/government/publications/education-for-a-connected-world>
- The school's mental health lead is: John Richardson

## Duty of Staff

It will be made clear to staff applying for posts within the School that the position is exempt from provisions of the Rehabilitation of Offenders Act 1974.

At School, all staff (teaching and non-teaching) seek to adopt an open and accepting attitude towards students as part of their responsibility for pastoral care. The staff hope that parents and carers and students feel free to talk about any concerns and see school as a safe place. Students' worries and fears will be taken seriously if they seek help from a member of staff. However, staff cannot guarantee confidentiality if concerns are such that referral must be made to the appropriate agencies in order to safeguard the child's welfare.

Staff who observe injuries which appear to be non-accidental, or who are told anything significant by a student, must report their concerns to Mireille Rabaté or a member of the deputy safeguarding leads, who are trained safeguarding professionals all of whom have attended and received Level 3 training on Child Protection (advanced safeguarding for designated staff training) which included training in child protection matters.

The Education Act 2011 introduced new provisions into the Education Act 1996 [section 550Z] which give school staff the power to search a student or his/her possessions if they believe them to be carrying any prohibited item. The Schools (Specification and Disposal of Articles) Regulations 2012 legislated for the following items to be treated as prohibited items and so subject to the power to search under s. 550Z of the Education Act 1996:

- Tobacco and cigarette papers, including vapes and e-cigarettes'
- Fireworks
- Pornographic images
- Legal Highs

These regulations also provide for the power of disposal of all of the above after investigation, unless in the case of pornographic images where prohibited images of children or extreme pornographic images where these must be delivered to the police as soon as possible.

All members of staff are required to sign a declaration whereby they confirm they understand the policy and procedures (on recruitment and following each review).

### Filtering and Monitoring

- Filtering and monitoring is in place to meet the Digital and Technology Standards March 2023
- The DSL has overall responsibility for filtering and monitoring - a safeguarding role not a technical role
- Governors: there is a nominated governor; governors must assure themselves that filtering and monitoring procedures meet requirements and are effective
- Senior Leadership Team: procure filtering and monitoring systems; document decisions on what is blocked or allowed and why; review the effectiveness of provision; oversee reports ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns; work closely with governors, the DSL and IT service providers in all aspects of filtering and monitoring.
- DSL: oversee and act on reports on the checking of filtering and monitoring, safeguarding concerns; check filtering and monitoring systems
- The IT Service provider (both in-house and external): maintain filtering and monitoring systems; provide filtering and monitoring reports; complete actions following concerns or checks to systems working with the leadership team and DSL to procure systems; identify risk, carry out reviews and undertake checks both inhouse or external.
- All staff:
  - Report if you see or suspect that unacceptable content has been accessed
  - Report if, for example, lesson planning and preparation you identify that unacceptable content can be accessed
  - Report in advance if teaching content might cause a spike in filtering logs. For example: drugs education
  - Report failure or abuse of the system

- Report any restrictions which are perceived to be unreasonable
- Report any abbreviations, mis-spellings or slang terms (particularly newly coined terms) which, when used in searches, may allow access to inappropriate content. Sometimes such terms are deliberately created in order to bypass filtering.
- an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring is included in safeguarding and child protection training at induction for all staff
- Filtering and monitoring is formally reviewed at least annually. The review team comprises a governor, member of SLT, DSL, IT provider. This includes checking students' browsing history. The review will be recorded and shared as appropriate South West Grid for Learning provides "360 safe" and LGFL provides "digisafe". Filtering blocks harmful content without 'overblocking' which may impact on teaching and learning or the school's administration. Whilst ensuring the online safety of students, the School also ensures that students are not prevented from undertaking genuine research about keeping safe or related to coursework
- Filtering is effective in any language used in the school
- Government Cybersecurity standards expect all staff and at least one governor to have basic cybersecurity training at least annually - National Cyber Security Centre (NCSCC) produces a free training pack in the form of A scripted pack for group training A self-learn video here:

<https://www.ncsc.gov.uk/information/cybersecurity-training-schools>

- The school has effective monitoring strategies to meet the safeguarding needs of the school. Monitoring includes:
  - Physical monitoring (ie staff presence)
  - Live software viewing
  - Monitoring user logs
  - Individual device monitoring

## **Duties of Designated Safeguarding and Deputy Safeguarding Leads:**

### **Safeguarding Squad 2024-25**

## Are you concerned about a student? Safeguarding Squad



**Michael Penrose**  
Safeguarding Governor  
safeguardinggov@lyceeinternational.london



**Bradley Eaton**  
Designated Safeguarding Lead  
safeguarding@lyceeinternational.london



**Mireille Rabaté**  
Head of School



**Julien Astruc**  
Head of Secondary



**Minisha Bist**  
Head of Primary



**Jean Baptiste Gamain**  
Head of Pastoral Care & Student Wellbeing



**Danielle Raymond**  
Head of Careers



**Laurent Batut**  
Chief Operating Officer



**Neil Hooley**  
Head of Early Years PS-MS



**Karolina Jarzyna**  
Head of Primary Cycle LP GS-CP



**Christina Rebello**  
Head of Primary Cycle MP CE1-CE2



**Aliya Faruqi**  
Head of Primary Cycle UP CM1-CM2



**Darielly Castillo-Whight**  
Head of Year 7/8



**Benoit Gschwind**  
Head of Year 9/10



**Eddy Labidi**  
Head of Year 11



**John Richardson**  
Head of Year 12



**Aljaž Tirič**  
Head of Year 13



**Laetitia Pavia**



**Valerie Lesage**



**Manon Delacote**



Scan me

Our Safeguarding Squad is trained at Level 3

## Are you concerned about a student? Safeguarding Squad (continued)



**Michael Penrose**  
Safeguarding Governor  
safeguardinggov@lyceeinternational.london



**Bradley Eaton**  
Designated Safeguarding Lead  
safeguarding@lyceeinternational.london



**Anna McEwan-Stephens**



**Erwan Le Roho**



**Laurence Perry**



**Leslie Losardo**



**Salome Singh**



**Marie-Hélène Sarfas**



**Vincent Sellier**



**John Feehan**



**Roxanne Turk**



**Jordi Barea**



**Anne Steinhauer**



**Hilary Sy-Quia**



**Ángeles Calderón**



**Min Zhu**



Scan me

Our Safeguarding Squad is trained at Level 3

DSLs and deputy DSLs (DDSLs) have formal training every two years (Level 3), and are updated every year. All other staff receive Level 1 training every year. The school is

proactive in ensuring that training will be kept updated and that DSLs will retrain all staff.

In accordance with the guidance KCSIE (Keeping Children Safe in Education) 2024 and Local Authority expectations, 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.

The role and duties of the **Designated Safeguarding Lead** are reflected in their [job description](#). The DSL is a member of the Senior Leadership Team (SLT).

Broad areas of responsibility proposed for the designated senior person for child protection in each establishment:

The Governing Body will ensure there is a suitably qualified and trained Designated Safeguarding Lead (DSL), with at least one Deputy trained to the same level. The following responsibilities form part of the DSL's Job Description. The DSL will:

- Ensure safeguarding children is a central ethos in the school and take lead responsibility to ensure that online activity, including filtering and monitoring systems, are checked regularly as per [this guidance](#)
- Ensure all staff have read the Safeguarding Children policy and part I and Annex A and B of Keeping Children Safe in Education 2024.
- Ensure all staff have developed skills and knowledge to identify and report abuse, including allegations of abuse against staff.
- Be the first point of contact for any member of staff worried about a child and provide advice and support to resolve that concern. The DSL will ensure they or a Deputy is available to staff during school hours and for any out of hours/out of term activities.
- Maintain oversight and hold ultimate lead responsibility for any concern about a child, including children requiring early help or child protection. This will include managing referrals by ensuring the DSL or a deputy is allocated to any child referred to children's services (including children in care and those who have returned home from care). This person will keep the DSL up to date, communicate all significant information and provide reports to other agencies and attend all relevant meetings for that child.
- Keep accurate and secure child protection records and send these securely on to any new schools (separately from the main file), in line with Keeping Children Safe in Education 2024.
- Refer cases as necessary to other agencies, including the Channel programme where there is a concern about radicalisation, the Police where a crime may have been committed and the Disclosure & Barring Service
- Where the DSL is not the head teacher, the DSL will liaise closely about any ongoing enquiries, police investigations or concern for children.
- Ensure the Safeguarding Children policy is reviewed at least annually, is available publicly and that parents are aware of the role of the school in

- safeguarding children including referral to other agencies
- Receive relevant training in role at least every two years and Prevent awareness training. The DSL must seek out additional learning opportunities to ensure their knowledge and skills are refreshed and they are aware of any change in requirements, including through the safeguarding children partnership. DSL's are engaged in ongoing supervision as part of their role.

If the DSL is not available, staff should speak with a deputy or a member of the SLT and/or take advice from the local children's social care.

## **Duty of parents and carers**

Parents and carers are expected to help their children to behave in non-violent and non-abusive ways towards both staff and other students. Parents and carers will be informed if it was necessary to use minimal force to protect a student from injury or to prevent a student from harming others.

Parents and carers should always inform the school of any accidental bruising or other injuries that might otherwise be misinterpreted. They should also inform the school of any changes in home circumstances, such as the death of a member of the family, separation or divorce, that might lead to otherwise unexplained changes in behaviour or characteristics.

## **Duty of the School to parents and carers**

Parents and carers can feel confident that procedures are in place to ensure that all staff appointed have undergone procedures to ensure that they are suitable to work with children. All voluntary helpers undergo similar procedures including a police check.

Every staff member and Board member has an enhanced DBS check

Guidelines on the procedures if an allegation is made about a member of staff are outlined in the Child Protection. These will be made available to a parent/ carer if they make an allegation against a member of staff. Parents and carers will be informed of the procedure if they make a formal complaint about a staff member or volunteer in the setting.

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, including filtering and monitoring.

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the Designated Safeguarding Lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Additional information regarding contextual safeguarding is available here: [Contextual Safeguarding](#).

The assessment of the child should consider whether wider environmental factors are present in a child's life that are a threat to their safety/welfare. Familial and extrafamilial safeguarding helps focus on the fact that young people experience harm within their families and recognises that different relationships formed by young people in their neighbourhoods/schools and online can feature violence and abuse. The school communicates with parents and carers to reinforce the importance of children being safe online through the Code of conduct and offers weekly digital workshops to support them.

## **8. Referrals**

All parents, carers and guardians must be aware that they can make a referral to the relevant Local Authority Multi Agency Safeguarding Hub team (MASH) about any suspected abuse or neglect. Parents, carers or guardians that do so are also required to inform the school Designated Safeguarding Lead (DSL) as named within this policy. The referral for an individual child must be made to the Multi agency safeguarding hub team responsible for the Borough in which the child resides.

The school is not able to share residential addresses or personal details related to any families registered in the school with other parents. However, should a referral be made to the School DSL, the School, if appropriate, may then contact the relevant MASH team to raise the concern.

- A referral may be made to provide "Early help". This means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- Refer cases of suspected abuse or allegations to the relevant investigating agencies.

- Act as a source of support, advice and expertise within the educational establishment when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with Head of School and safeguarding governor (where role is not carried out by the Head of School) to inform her of any issues and ongoing investigations and ensure there is always cover for this role.
- Liaise with the Local Child Protection Board to ensure awareness of local multi-agency procedures, local referral procedures and training opportunities, and maintain a list of local multi-agency contacts.

## 9. Raising Awareness

- Ensure the School's Safeguarding Policy is updated and reviewed at least annually and work with the governing body/proprietor regarding this.
- Ensure parents and carers see copies of the Safeguarding Policy, which alerts them to the fact that referrals may be made, and the role of the School in this to avoid conflict later.
- When children leave the School ensure the local authority and the next school are contacted, and safeguarding information sent where appropriate, wherever possible, within 5 working days, or if a child leaves at the end of a school year, within 5 working days of the start of the following term.

## 10. Training

- Staff are supported in being able to identify signs of abuse and when it is appropriate to make a referral.
- Designated Safeguarding Lead Staff have a working knowledge of how the Local Safeguarding partnership operates, the conduct of a child protection case conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's Policy #6: Policy and Procedures for Safeguarding and Child Protection, especially new/part time/supply staff who may work with different educational establishments.
- All staff have induction training covering child protection policy, the behaviour policy, the staff behaviour policy, the safeguarding response to children who go missing or who are absent from education, Prevent, online safety, the role of the DSL and any deputies (KCSIE 2024) and are able to recognise and report any concerns immediately they arise.
- DSL's and deputies receive training every two years in addition to formal training to include inter-agency working and Prevent
- All staff have yearly updates and refreshed safeguarding knowledge annually

- and where necessary throughout the year
- Staff are able to keep detailed, accurate, written records of referrals/concerns.
  - Special Educational Needs or disabilities (SEND): Staff recognise the additional risks that children with SEN and disabilities face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online. Staff are aware that the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs. Communication barriers and difficulties in managing or reporting these challenges must be taken into consideration. Further information can be found in the Department for Education's [SEND Code of Practice 0 to 25 years](#), and [Supporting Pupils at School with Medical Conditions](#). The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). Brent [SENDIASS](#) offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](#)
  - Safer recruitment training is available to all relevant staff and governors involved in the recruitment process. Each interview panel includes someone who has undertaken safer recruitment training.
  - Safeguarding training is delivered through the Peer counselling programme. Peer counsellors help deliver safeguarding awareness sessions, signposting and identify sources of support to other students

## 11. Definitions and Symptoms of Abuse

Keeping Children Safe in Education 2024 has highlighted the role that schools play in detecting possible problems and supporting good mental wellbeing. At the School we do everything we can to prevent the impairment of children's mental (as well as physical) health and development. All staff are aware that mental health problems can be an indicator of abuse, neglect or exploitation.

Child abuse is a form of maltreatment of a child under 18 years. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

**There are four main categories of abuse:**

- physical injury,

- **neglect,**
- **sexual abuse, and**
- **emotional/mental health abuse**

Brief definitions are given below. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should **always** speak to the designated safeguarding lead (or deputy).

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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.

**Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (such as that previously known as Munchausen Syndrome by Proxy).

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and is covered elsewhere in our policy.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or

'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The Children Act 1989 introduced the concept of "Significant Harm" as the threshold that justifies compulsory intervention in family life in the interests of children. There are no absolute criteria to rely on when judging what constitutes significant harm. Overall, it can be described as the detrimental outcome of various forms of child maltreatment to the child's wellbeing.

**Harm** means ill treatment or the impairment of health or development.

**Development** means physical, intellectual, emotional, social or behavioural development.

**Ill-treatment** includes sexual abuse and forms of ill treatment, which are not physical.

**Health** includes physical or mental health.

Where the question of whether harm suffered by a child is significant turns on the child's health and development, the child's health or development shall be compared with that which could reasonably be expected of a similar child.

- The list of symptoms given is not exhaustive or comprehensive but consists of frequently observed symptoms.
- It is important to remember that most abuse involves more than one main type, for example, sexual and emotional abuse may be recognised together.
- These symptoms, for example cuts and grazes, may also be accidental and not a sign of abuse.
- These different types of abuse require different approaches.
- A child suffering from physical abuse may be in immediate and serious danger. Action should, therefore, be taken immediately.
- With other forms of abuse there is a need to ensure that adequate information is gathered.
- There is also a need to make sure that grounds for suspicion have been adequately investigated and recorded.
- The need to collate information must be balanced against the need for urgent action.
- If there are reasonable grounds for suspicion, then a decision to monitor the

situation should only be taken after consultation.

- A situation that should cause particular concern is that of a child who fails to thrive without any obvious reason. In such a situation a medical investigation will be required to consider the causes.

## 1. Physical Injury

Symptoms:

- Bruises and abrasions - especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of injury or when it appears frequently.
- Slap marks – these may be visible on cheeks or buttocks.
- Twin bruises on either side of the mouth or cheeks - can be caused by pinching or grabbing, sometimes to make a child eat or to stop a child from speaking.
- Bruising on both sides of the ear – this is often caused by grabbing a child that is attempting to run away. It is very painful to be held by the ear, as well as humiliating and this is a common injury.
- Grip marks on arms or trunk - gripping bruises on arm or trunk can be associated with shaking a child. Shaking can cause one of the most serious injuries to a child; i.e. a brain haemorrhage as the brain hits the inside of the skull. X-rays and other tests are required to fully diagnose the effects of shaking. Grip marks can also be indicative of sexual abuse.
- Black eyes - are mostly commonly caused by an object such as a fist coming into contact with the eye socket. NB. A heavy bang on the nose, however, can cause bruising to spread around the eye but a doctor will be able to tell if this has occurred.
- Damage to the mouth - e.g. bruised/cut lips or torn skin where the upper lip joins the mouth.
- Bite marks
- Fractures
- Poisoning or other misuse of drugs - e.g. overuse of sedatives.
- Burns and/or scalds - a round, red burn on tender, non-protruding parts like the mouth, inside arms and on the genitals will almost certainly have been deliberately inflicted. Any burns that appear to be cigarette burns should be cause for concern. Some types of scalds known as 'dipping scalds' are always cause for concern. An experienced person will notice skin splashes caused when a child accidentally knocks over a hot cup of tea. In contrast a child who has been deliberately 'dipped' in a hot bath will not have splash marks.

## 2. Neglect

### Symptoms:

- Dirty
- Lack of appropriate clothing
- Smells of urine
- Unkempt hair
- No parental interest (a distinction needs to be made between situations where children are inadequately clad, dirty or smelly because they come from homes where neatness and cleanliness are unimportant and those where the lack of care is preventing the child from thriving.)
- Underweight – a child may be frequently hungry or preoccupied with food or in the habit of stealing food or with the intention of procuring food. There is particular cause for concern where a persistently underweight child gains weight when away from home, for example, when in hospital or on a school trip. Some children also lose weight or fail to gain weight during school holidays when school lunches are not available and this is a cause for concern.
- Body sores
- Not wanting to communicate
- Behaviour problems
- Attention seeking
- Lack of respect
- Often in trouble - police
- Bullying
- Use of bad language
- Always out at all hours
- Stealing
- Lack of confidence - low self-esteem
- Jealousy
- Neglect by affluence

## 3. Sexual Abuse

### Symptoms:

- A detailed sexual knowledge inappropriate to the age of the child.
- Behaviour that is excessively affectionate or sexual towards other children or adults.
- Attempts to inform by making a disclosure about the sexual abuse often begin by the initial sharing of limited information with an adult. It is also very characteristic of such children that they have an excessive

preoccupation with secrecy and try to bind the adults to secrecy or confidentiality.

- A fear of medical examinations.
- A fear of being alone – this applies to friends/family/neighbours/baby-sitters, etc
- A sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa.
- Excessive masturbation is especially worrying when it takes place in public.
- Promiscuity
- Sexual approaches or assaults - on other children or adults.
- Urinary tract infections (UTI), sexually transmitted disease (STD) are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified.
- Bruising to the buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place.
- Discomfort or pain particularly in the genital or anal areas.
- Drawing of pornographic or sexually explicit images.
- Withdrawn rejecting physical contact or demanding attention

#### **4. Emotional Abuse/Mental health**

Symptoms:

- Crying
- Rocking
- Withdrawn
- Not wanting to socialise
- Cringing
- Picking up points through conversation with children
- Bad behaviour
- Aggression
- Behaviour changes
- Bribery by parent
- Self-infliction
- Lack of confidence
- Attention seeking
- Isolation from peers - unable to communicate
- Clingy
- Afraid of authoritative figures
- Treating others as they have been treated
- It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

## **Child Sexual Exploitation (CSE) / Child Criminal Exploitation (CCE)**

- Child sexual exploitation (CSE) is a form of child sexual abuse. Sexual abuse may involve physical contact or non-contact activities such as involving children in the production of sexual images. CSE can affect any child coerced into sexual activities. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. CSE can involve 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.
- The statutory definition can be found in the guidance documentation on Child sexual exploitation: Definition and a guide for practitioners 2017 [here](#).
- Child Criminal Exploitation (CCE) can include being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced into commuting vehicle crime or threatening/committing crimes to others.
- Both CSE and CCE occur where a power imbalance is used to coerce, manipulate, or deceive a child into sexual or criminal activity.
- Further Information on CSE and CCE can be found in KCSIE (2024).

## **County lines**

County lines is a form of Child Criminal Exploitation. This involves drug networks or gangs that groom and exploit children and young people to carry drugs and money between urban areas to suburban and rural areas, market and seaside towns.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. To support victims of exploitation, a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any susceptible adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance

can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. Information on County lines is found in KCSIE (2024).

## Child on Child abuse

All staff and governors should be aware that safeguarding issues can manifest themselves via child on child/child on child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- abuse in intimate relationships between children;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- Consensual or non-consensual sharing of nude and semi-nude images or videos (also known as sexting or youth produced sexual imagery); these images may be AI generated.
- Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.
- Initiation/hazing type violence and rituals. Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or academic health or safety of a student.

Systems are in place for children to confidently report abuse, knowing their concerns will be treated seriously. In responding to incidents of sexual harassment, the school ensures that actions to make the location of the incident safer is included in any risk assessments. This includes:

- Support is in place for victims, perpetrators and any other children and siblings involved.
- Recognition is made that even if no reported case of peer-on-peer abuse, such abuse may still be taking place and is not being recorded
- A zero tolerance approach to abuse is in place at all times and is not considered as 'just banter' or similar.
- It is most likely that girls will be victims and boys perpetrators but all abuse will be treated seriously
- Staff recognise that those children who are LGBTQIA could potentially be more susceptible to child on child abuse

- All staff and governors should be clear as to the school's or college's policy and procedures with regards to child-on-child abuse
- Appropriate support is always offered to the perpetrator (if on the school's roll) and any other children

KCSIE 2024 Part 5 and the separate guidance 'Sexual violence and sexual harassment between children in schools and colleges' sets out how schools and colleges should respond to reports of sexual violence and sexual harassment.

## Sharing nudes and semi-nudes (previously known as 'sexting')

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the [UK Council for Internet Safety](#) (UKCIS): Sharing nudes and semi-nudes (December 2020). Staff are aware that, for their own protection:

1. they must avoid seeing or sharing any images which may be considered as illegal; They must pass on any suspicion to the DSL, without checking images, forwarding files etc.
2. If they unavoidably see an illegal image of a child, (for example, if it is shown to them without their knowing what they were going to see), they must immediately report this to the Head, to avoid any allegation of being involved in the viewing and distribution of child pornography.

## Serious violence

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include frequent absence from school, a change in friendships, or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also explain that children have been approached by, or are involved with, criminal networks or gangs.

## Female Genital Mutilation (GM)

Female Genital Mutilation (FGM): whilst all staff should speak to the DSL with concerns about FGM, there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out, the teacher **must** report this to the police. See KCSIE page 160 for further information.

- Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.
- Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.
- For information on warning signs that FGM may be about to take place, or may have already taken place, please refer to the Multi-Agency Practice Guidelines which can be found in the Policy drive. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.
- It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

## **FGM 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 anyone who undertakes "teaching work", 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 or may be due to be carried out on a girl under 18.
- Useful information can be found [here](#).
- 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 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 school's designated safeguarding lead and involve children's social care as appropriate.

## **Domestic abuse**

In April 2021 the Domestic abuse act received Royal Assent and introduced a statutory definition for the first time.

### Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The school recognises the detrimental long-term impact domestic abuse can have on children

## Mental health

- All staff at the Lycee International de Londres are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.
- If staff have a mental health concern about a child, they should consult the School's Mental Health Lead immediately.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the Designated Safeguarding Lead or a deputy.

## **Children with a social worker**

- We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students.
- This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.
- We will liaise with the Virtual Headteacher as required from June 2021 to promote the education of children with a social worker. Our lead for Looked After Children is: Bradley Eaton
- We will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.
- We will work with external agencies on matters of safety and safeguarding

## **Children Missing or Absent from education**

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school tries to work with key professionals to coordinate a meeting with parents/carers. Ideally, this is before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child.

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Being missing or absent from school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

- We monitor attendance carefully and address poor or irregular attendance without delay.

- We will always follow up with parents/carers when students are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if their numbers change.

In response to the guidance in Keeping Children Safe in Education (2024) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for students who go missing or absent from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage or suggested marriage for those under the age of 18.
- Procedures to inform the local authority when we plan to take students off-roll when they:
  - leave school to be home educated
  - move away from the school's location
  - remain medically unfit beyond compulsory school age
  - are in custody for four months or more (and will not return to school afterwards); or
  - are permanently excluded
- We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.
- When a student leaves the school, we will record the name of the student's new school and their expected start date in compliance with [Working Together to Improve School Attendance](#) (updated September 2024).

## Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially susceptible group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

Parents should ensure any host families have adequate safeguarding knowledge and training through discussion with the accredited provider.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered. The school requests confirmation of safeguarding awareness from all hosts.

## **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 susceptible people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act

proportionately which may include making a referral to the Prevent programme <https://www.gov.uk/government/publications/channel-guidance>

## Specific safeguarding issues

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools and colleges can be found on the TES website and NSPCC website. Schools and colleges can also access broad government guidance on the issues listed below via the GOV.UK website:

- Child missing or absent from education
- Child missing or absent from home or care
- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence and abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage or suggested marriage before the age of 18
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Preventing radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking
- Honour based violence including breast ironing
- Child abduction and community safety incidents
- Children and the court system
- Children with family members in prison
- Modern slavery and the National Referral Mechanism
- Homelessness

## 12. Confidentiality

The school's information sharing policy is based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).

We acknowledge the following statements from Keeping Children Safe in Education

(2024), paragraph 119 ‘The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.’  
and paragraph 118 ‘This includes allowing practitioners to share information without consent...’

### 13. Online safety

Online safety and the Lycee’s approach considers Content, Contact, Conduct and Commerce. We realise that many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, may sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

At Lycee International de Londres when students use the school’s network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems, a Sophos firewall and JAMF Mobile Device Management. However, many students are able to access the internet using their own data plan. To minimise inappropriate use, as a school we follow the Common Sense Media programme to educate our student about online safety, have regular visits from the local safeguarding structures, use pix certification in year 9 and 13 we manage this risk by training students through the PSHE/RSE curriculum, Common Sense Media, Pix certification in Year 9 and Year 13 to assess and monitor online safety, and ensure reinforcement through the web librarian discussions and learning opportunities to celebrate responsible use. We discuss online safety issues during *Heure de Vie de Classe* and Assemblies to keep our community aware and responsible.

The school communicates with parents and carers to reinforce the importance of children being safe online through the Code of conduct and offers weekly digital workshops to support them. Staff receive mandatory training at the beginning of the year as well as throughout the year during their induction period. Those training sessions are conducted by the IT Manager as well as the DSL and school leaders include understanding roles and responsibilities in relation to filtering and monitoring and appropriate filtering and monitoring should be in place on school devices and school networks. The Department for Education has published [filtering and monitoring](#) standards. Guidance on e-security is available from the [National Education Network](#). In addition, schools and colleges should consider meeting the [Cyber security standards for schools and colleges.GOV.UK](#). Broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - [NCSC.GOV.UK](#). The school also uses the [LGfL](#)

[online safety audit](#) tool.

## 14. Monitoring and Record Keeping

It is essential that accurate records be kept where there are concerns about the welfare of a child. Pastoral care concern sheets are to be filled in (appendix 3) and given to the DSL or Heads of Year or CTL, who will record it and file it as an 'incident' using the secure online Child protection management system, CPOMS.

This system allows the DSL and DDSs to assign each 'incident' to the person most able to resolve it. DSL and DDSs are responsible for following up and checking the resolution of the 'incident' and report it as 'closed' on CPOMS.

CPOMS keeps those files secure and confidential and separate from the child's school records. The School recognise that regulations published in 1989 do not authorise or require the disclosure to parents and carers of any written information relating to Child Protection. However, where circumstances allow, the School aims to inform parents and carers and agree to any referral being made, unless it relates to sexual abuse or safeguarding, of which the disclosure could result in further risk of harm to the child.

Information added in regard to safeguarding concerns must include written evidence of decisions and actions and is regularly monitored using the CPOMS software in order to identify any potential patterns.

Staff must keep the primary and the secondary DSL (as required) informed of:

- Poor attendance & punctuality
- Concerns about appearance and dress
- Changed or unusual behaviour
- Concerns about health and emotional well-being
- Deterioration in educational progress
- Discussions with parents and carers about concerns relating to their child
- Concerns about home conditions or situations
- Concerns about student on student abuse (including serious bullying)

When there is suspicion of significant harm to a child and a referral is made as much information as possible should be given about the nature of the suspicions, the child and the family. Use of previous records (if available) may prove to be particularly useful in this respect. Parental consent is not required for referrals to statutory agencies.

All communications, whether verbal or written, are strictly confidential and only when the Head deems it appropriate, will other members of staff be informed.

Support must be given to members of staff involved in child protection referral and, in the interest and protection of all staff, the procedure for child protection shall be under continual review in order to eliminate any bad practice.

The Management of School recognises that staff involved in a child protection issue will find it distressing and will offer support and guidance accordingly.

For contact with Child protection specialists available for consultation in the London Borough of Brent, the Head or the DSL will contact the Brent Family Front Door:

[https://brent-self.achieveservice.com/en/AchieveForms/?form\\_uri=sandbox-publish://AF-Form-3b3ff798-641b-403f-8910-992998237b30/definition.json&\\_ga=2.181648935.167932428.1648454590-1376779049.1597221782](https://brent-self.achieveservice.com/en/AchieveForms/?form_uri=sandbox-publish://AF-Form-3b3ff798-641b-403f-8910-992998237b30/definition.json&_ga=2.181648935.167932428.1648454590-1376779049.1597221782)

The Head of School must contact the Local Authority Designated Officer (LADO) in case of allegations made against staff.

## **15. Disclosure and Action following a Disclosure (child)**

Where a student discloses concerns or makes an allegation no judgement should be made or enquiries initiated by the staff member. Merely listening and seeking clarification is required before consulting with the designated DSL. Confidentiality should not be promised to anyone. A record should be kept of the conversation. Where there is a suspicion that a child is suffering or likely to suffer significant harm, the concern should be referred without delay to the Head/DSL.

Where the child requires urgent medical treatment an ambulance should be called to take him/her to hospital and concerns raised with the DSL.

## **16. Action for the DSL**

Following a disclosure, the Designated Safeguarding Lead will then speak to the parent/carers in the case of evidence of physical abuse to seek an explanation, but only if the disclosure poses no risk of further harm to the child, nor does it jeopardise any future police investigation.

In the event of disclosure of suspected sexual abuse on school site, an immediate referral to the local Children's Social Care will be made by the DSL.

In all other cases of suspected abuse, the DSL will enter into preliminary discussion with the parents and carers to ascertain any possible explanation. These discussions are exploratory, and the DSL should be careful not to prejudice the outcome of any

potential multi-agency investigation.

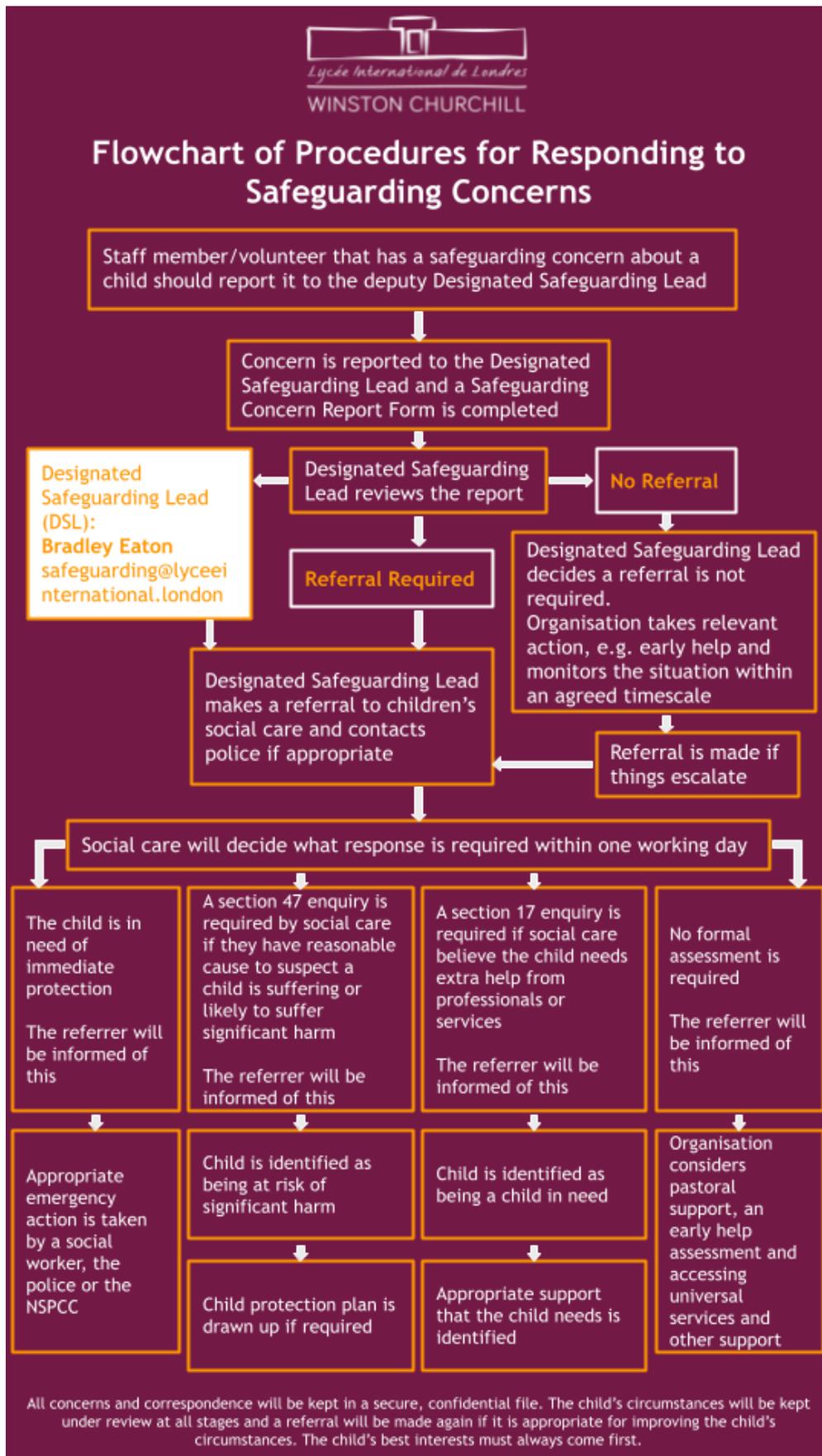
Where, following preliminary enquiries by the DSL, a prima facie case of abuse is apparent, or where there are contraindications to preliminary enquiries, a referral should be made under local multi-agency arrangements. The referral should be made by email (or as required by Brent safeguarding children Board) either at the time of the initial disclosure or within 24 hours of the incident to the local Children's Social Care.

The person making the referral should provide the following information if available:

- Details about their own location, status and relationship with the child;
- Whether the child is currently safe and any deadlines approaching (e.g. child about to be" collected by parent; alleged abuser returning imminently to household);
- When the child was last seen and the current location of the child;
- The child's name, date of birth, sex, disability, or any known health care issues, ethnic origin, religion, language spoken;
- Any other names the child or family members have been known by;
- The address of the child and parents and carers, and any known previous addresses;
- The family and household structure and details of any other significant people in the child's life;
- Details of the concern (if an incident, the time, place, persons involved);
- Information regarding parental knowledge or, and if appropriate, agreement to the referral.

**The following flow chart is published and visible throughout the school to ensure the information of the school community.**

# 17. FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD



## 18. Whistleblowing

### Allegation against staff and volunteers

Where there is an allegation against staff or volunteers within the school, this must be reported to the DSL and Head of School who will gather information and inform the LADO. The LADO will advise on how best to proceed and whether the police need to be involved in any investigation.

The following definitions are used by the LADO when determining the outcome of allegation against professionals investigations:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

**If the allegation concerns the Head of School, it must be reported to the Chair of Governors, without informing the Head of School.**

All staff will be made aware of the importance of whistle-blowing and feel confident to voice concerns about the attitude or actions of colleagues ([Policy #22: Whistleblowing Policy](#)).

If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the Brent LADO. See also [Local Safeguarding Children Boards Procedure](#)

<http://www.londonscb.gov.uk/procedures>

NSPCC provides information on its [website](#). Staff can call, its helpline (0800 028 0285) from 8am to 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### Concerns about staff behaviour

#### 1. Definition of the harm test

Someone's action satisfies the harm test when it appears that they may:

- harm a child and/or an adult
- cause a child and/or an adult to be harmed
- put a child and/or an adult at risk of harm
- attempt to harm a child and/or an adult

- incite another to harm a child and/an adult

## **2. Allegations that may meet the harm threshold**

The School will address all allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors, when they meet the harm threshold.

We recognise the possibility that adults working in the school including governors, volunteers, supply teachers and agency staff may harm children. Any concerns about the conduct of other adults in the school should be taken to the Head of School without delay. Any concerns about the Head of School should go to the Chair of Governors who can be contacted at [chairofgovernors@lyceeinternational.london](mailto:chairofgovernors@lyceeinternational.london).

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Head of School has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Designated Officer (LADO) (see below).

### **Allegations**

It is an allegation if the person\* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).
- (\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

## **3. Low-level Concerns**

Concerns may be graded low-level if the concern does not meet the criteria for an allegation or the person has acted in a way that is inconsistent with the staff code of conduct (Team Handbook), including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Low Level Concerns must be reported directly to the Head of School. If the concern is about the Head of School, it must be reported directly to the Chair of Governors. If the concern has been raised via a third party, the Head of School should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Such reports are still managed by the school and the employer is kept informed. Management of such concerns is not handed over to the employer.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

The guidance in KCSIE 2024 (Part Four) should be followed where it is alleged that anyone working in the school or college including non-school activities (After School Programme, *Garderie*, educational trips, drama rehearsals, sports competitions, orchestra, etc.) that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;

or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Where there are concerns about any safeguarding allegation regarding persons who hire the school premises to run events or activities which involve children, the School will follow the present safeguarding policies and procedures, including informing the Local Authority Designated Officer without delay if appropriate.

## **19. Disclosure and actions following a disclosure (adult)**

**London Child Protection Procedures - Child Protection - Professional Abuse Policy**  
Guidelines for the management of allegations of abuse by staff and other Professionals.

These guidelines are taken from the **London Child Protection Procedures 5<sup>th</sup> Edition 2013 section A.**

For further details refer to the LCPP

<http://www.londoncp.co.uk/>

### **General considerations relating to allegations and concerns of abuse**

The employer will inform the Brent Family Front Door 020 89374300 / <https://www.brent.gov.uk/services-for-residents/children-and-family-support/child-protection-and-care/report-a-concern-about-a-child/> immediately after an allegation is made or within one working day.

They will then advise the employer whether or not informing the parents and carers of the children involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially

shared, the employer will inform the parents and carers. In some circumstances, however, the parents and carers may need to be told straight away (e.g. if a child is injured and requires medical treatment).

The employer will seek advice from the LADO, the police and/or LA children's social care about how much information should be disclosed to the accused person. Subject to restrictions on the information that can be shared, the employer will, as soon as possible, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body)

The accused member of staff should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- If suspended, be kept up to date about events in the workplace.
- 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:
- 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](mailto:help@nspcc.org.uk).

## Confidentiality

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and carers and accused person (where this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

The police should not provide identifying information to the press or media, unless and until a person is charged, except in exceptional circumstances (e.g. an appeal to trace a suspect). In such cases, the reasons should be documented and partner agencies consulted beforehand.

Section 13 of the Education Act 2011 provides restrictions on the publication of any information that would identify a teacher who is the subject of an allegation of misconduct that would constitute a criminal offence, where the alleged victim of the offence is a registered student at the school.

Such restrictions remain in place unless or until the teacher is charged with a

criminal offence, though they may be dispensed with on the application to the Magistrates' Court by any person, if the court is satisfied that it is in the interests of justice to do so, having regard to the welfare of:

- The person who is the subject of the allegation;
- The victim of the offence to which the allegation relates.

There is a right of appeal to the Crown Court.

This restriction will apply to allegations made against any teacher who works at a school, including supply and visiting teachers.

Publishing any information in breach of these restrictions is an offence. Publication includes any communication, in whatever form, which is addressed to the public at large or any section of the public.

It is a defence to show that the person publishing was not aware of the allegation having been made as set out in section 141H 'Defences' of the Act.

From September 2016 A section 128 direction prohibits or restricts a person from taking part in the management of an independent school.

## Support

The organisation, together with Local Authority children's social care and/or police, where they are involved, will consider the impact on the child concerned and provide support as appropriate. Liaison between the agencies will take place in order to ensure that the child's needs are addressed.

As soon as possible after an allegation has been received, the accused member of staff should be advised to contact their union or professional association in order that appropriate support can be provided via the organisation's occupational health or employee welfare arrangements.

## Suspension

Suspension is a neutral act and it will not be automatic. It will be considered in any case where:

- There is cause to suspect a child is at risk of significant harm;
- The allegation warrants investigation by the police;
- The allegation is so serious that it might be grounds for dismissal.

If a strategy meeting/discussion is to be held or if the LA children's social care or the police are to make enquiries, the LADO will canvas their views on suspension and inform the employer. Only the employer, however, has the power to suspend an

accused employee and they cannot be required to do so by a local authority or police.

Suspension does not imply a finding of guilt but is intended to enable a dispassionate investigation of the facts, unimpeded by interpersonal tensions. Any employee who is suspended will be informed immediately for the reason for suspension.

## **Referral to the Disclosure and Barring Service (DBS)**

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide their services, the LADO will discuss with the employer whether a referral will be made to Disclosure and Barring Service and/or a regulatory body e.g. Teacher Regulation Agency, the DfE employer's access or General Medical Council).

The referral will be made using the DBS Referral Form: <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>, after consulting the DBS Referral Guidance or contacting the DBS barring helpline Telephone: 01325 953795)

Consideration will then be given by the DBS as to whether the individual will be barred from, or have conditions imposed in respect of, working with children.

Employers have a legal duty to refer concerns to the DBS. A referral **MUST** be made when an employee or volunteer is removed from working with children or vulnerable adults (even temporarily) because the employer thinks the person has engaged in relevant conduct. A referral must also be made if someone who is barred from working with children applies for a post at the school.

If a referral is to be made, it will be submitted within one month of the allegation being substantiated.

\*Relevant conduct is when a person has harmed or may have harmed a child or vulnerable adult. Inciting or encouraging another person to harm a child or vulnerable adult is also relevant conduct.

## **20. Safer Recruitment**

The School operates according to its [Policy #19: Policy and Procedure for Safer Recruitment](#) and complies with the Independent School Standards Regulations. All prospective staff are subject to criminal records checks, checks by the Disclosure and Barring Service (DBS), Teacher Service, DfE employer's access (contact [employer.access@education.gsi.gov.uk](mailto:employer.access@education.gsi.gov.uk)). Additionally the School carries out careful checks for online presence.

All Staff are made aware of the Childcare Act (2006). 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 he or she is considered unsuitable to work with children.

All Senior Management attend Safer Recruitment Training as required by law.

## **All new appointments to regulated activity**

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

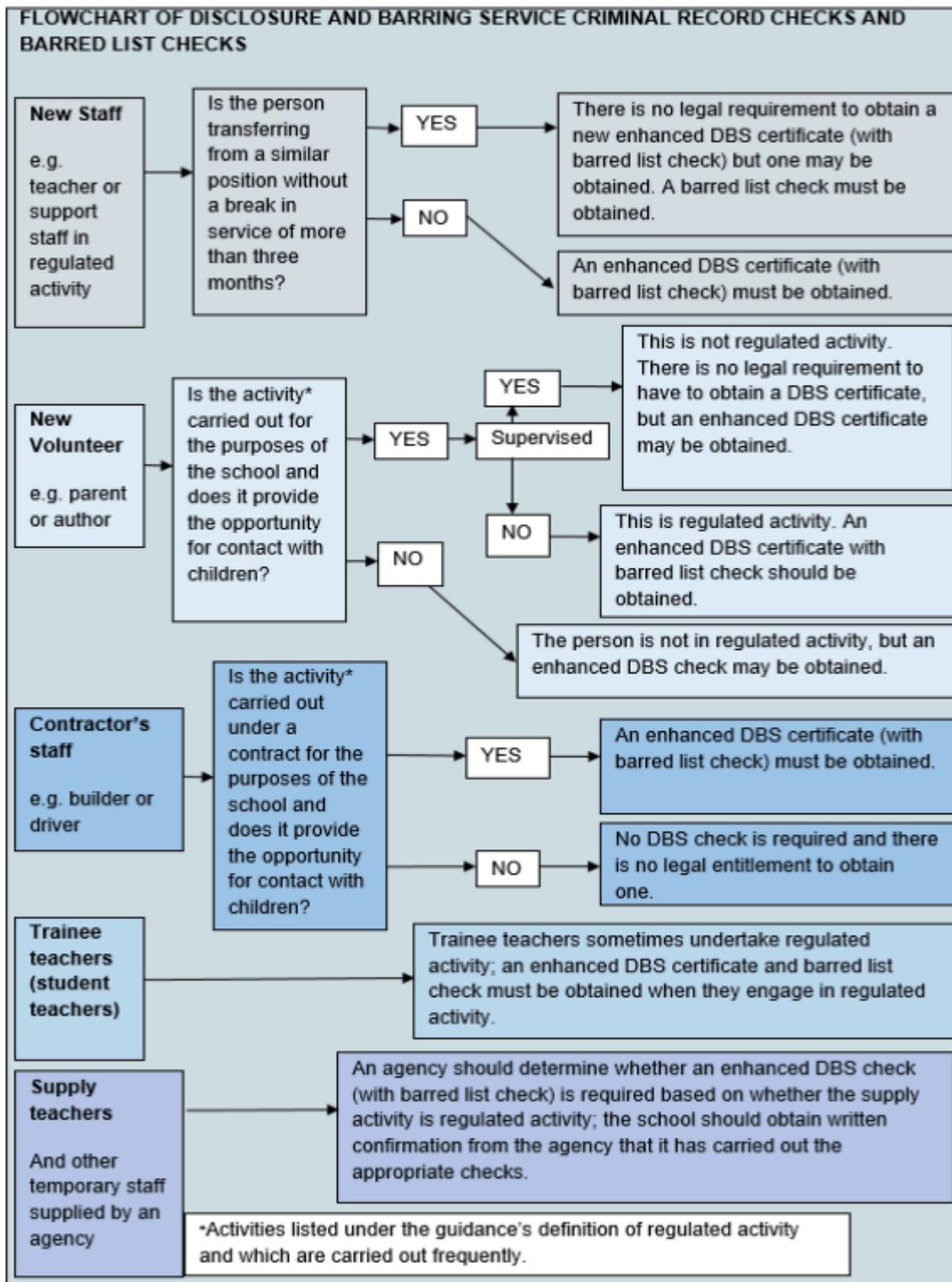
- Verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available;
- Obtain a certificate for an enhanced DBS check with a barred list information where the person will be engaging in regulated activity;
- Obtain a separate barred list check (with BDS barred list service) if an individual will start work in regulated activity before the DBS certificate is available;
- Check that a candidate to be employed to undertake teaching work is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service (DfE employer secure online access);
- Verify the candidate's mental and physical fitness to carry out their work responsibilities (this cannot be done before the position is offered and the job offer will need to be conditional on the medical check);
- Verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then prospective employers, or volunteer managers, should follow advice on the GOV.UK website;
- If the person has lived or worked outside the UK, make any further checks (for example French casier judiciaire) the School considers appropriate to satisfy itself that the person can work with children;
- Verify any qualifications, as appropriate for the position.
- References should be scrutinised and any concerns resolved satisfactorily, before the appointment is confirmed, including for any internal candidate.
- For a person taking up a qualifying position of governance or management, a check must be made that he/she is not subject to a section 128 direction prohibition made by the Secretary of State.

If an individual commences work before the DBS arrives, which they may do if there is a written risk assessment to be reviewed every two weeks, then the school must undertake a barred list check on or before the first day of work unless they are in

the DBS update service.

The Human Resources Department in collaboration with the DSL ensures that relevant policies and procedures include reference to supply teachers and how allegations against them will be handled.

The Human Resources Department conducts an online search for shortlisted candidates and inform candidates this will be undertaken.



## APPENDIX 1: What to do if a child approaches you to discuss allegations of abuse

Any member of staff who has contact with children at School may be approached by a child who needs to talk about something in confidence. Here are some basic principles to follow if this happens to you.

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

**Appendix 2:**  
**Guidance of Expected Behaviour for All Staff and Volunteers**  
**Interacting with Students:**

**Employees and Adults must not:**

1. Staff and volunteers **should not** spend excessive amounts of time alone with children, away from others. Meetings with individual children should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff or volunteers should be aware of the meeting. Where external agencies seek to make contact with a child about a safeguarding concern, an appropriate adult should be present.
2. Staff and volunteers are **advised not to** make unnecessary physical contact with children. However, there may be occasions when physical contact is unavoidable, such as providing comfort at times of distress, or physical support in contact sports or similar. In all such cases contact should only take place with the consent of the child.
3. Staff should not have any images of students on personal mobile phones, laptops or ipads, or other personal devices. Staff should not engage with students inappropriately on social media platforms.
4. It is **not good practice** to take children alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents and carers (or guardians) and the head or a member of the Senior Leadership Team (SLT).
5. Staff and volunteers **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. **You should just record the facts and report these to a designated person.**
6. Where there are opportunities for non-school activities on the premises, the school ensures that the body has appropriate safeguarding and child protection policies and procedures in place and there are liaison arrangements with school on these matters where appropriate.

7. Staff and volunteers should **never**:

- Initiate or engage in sexually provocative conversations or activity;
- Engage in inappropriate/ overly familiar relationships with students;
- Allow the use of inappropriate language to go unchallenged;
- Do things of a personal nature for children that they can do themselves;
- Allow any allegations made by a child go without being reported and addressed;
- Either trivialise or exaggerate child abuse issues;
- Make promises to keep any disclosure confidential from relevant authorities.

8. Staff or volunteers **should not** show favouritism to any one child, nor should they issue or threaten any form of physical punishment.

9. The use of ‘reasonable force’ in schools and colleges

- There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people.
- The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children
- This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.
- ‘Reasonable’ in these circumstances means ‘using no more force than is needed’
- Departmental advice for schools is available at [Use of Reasonable Force in Schools](#). Staff should be aware of the low level concerns in the allegations section
- The schools’ policy on Students’ Use of ICT and Electronic Devices on internet safety, use of mobile technology is available on the school website (policy 11), [and includes an addendum for EYFS use of mobile phones policy](#).

## Employees and Adults

1. Staff and volunteers **must respect** children’s rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviour they do not like.

2. Staff and volunteers **will be expected** to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their role within the school.

3. All staff and volunteers **should be aware** of the procedures for reporting concerns or Incidents, and should familiarise themselves with the contact details of the designated persons.

4. If a member of staff or volunteer finds himself or herself the subject of inappropriate affection or attention from a child, **they should** make others aware of this.

5. If a member of staff or volunteer has any concerns relating to the welfare of a child in his/her care, be it concerns about actions/behaviours of another staff member or volunteer, or concerns based on any conversation with the child; particularly where the child makes an allegation, they should report this to a designated person.

## Appendix 3: Concern Form

Please complete this information on CPOMS if you have any concerns about a student (if you don't have access to CPOMS, please refer to the HOY).

Student Name	Include linked students names if appropriate		
Class Day/Date/Time			
Member(s) of staff noting concern			

Concern (Please describe as fully as possible)

Include category ( type) of incident ( eg level 2 behaviour), **what** happened, **who** was involved, **where** the incident or conversation took place, **what** action has been taken and the **reason** for the referral

Do not use full names of other students in the description, use initials so that if the safeguarding files need to be transferred, the linked students can be anonymised by the filtering system.

Date: of the recording of the incident

Assign to the appropriate member of staff			
			If you require feedback on the situation please liaise with the assigned safeguarding lead

## Useful Contacts/ Resources/Legislation

### **Local Safeguarding Children Board (LSCB)**

<http://www.londonscb.gov.uk>

**Ofsted** Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 03001234234

Email: [enquiries@ofsted.gov](mailto:enquiries@ofsted.gov) Website: [www.ofsted.gov.uk](http://www.ofsted.gov.uk)

**Independent Schools Inspectorate** CAP House, 9-12 Long Lane, London, EC1A 9HA

Telephone: +44 (0)20 7600 0100 Email: [info@isi.net](mailto:info@isi.net) Website: [www.isi.net](http://www.isi.net)

### **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@db.s.gsi.gov.uk](mailto:customerservices@db.s.gsi.gov.uk)

**NSPCC** has a new website. Staff can call 0800 028 0285 from 8am to 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**Childline:** Tel: 0800 1111 [www.childline.org.uk](http://www.childline.org.uk)

**Deficiencies and Weaknesses:** It is the duty of all members of Staff and the proprietor to draw to the attention 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 Proprietor informed). The Proprietor will arrange for the complaint to be investigated.

## Statutory framework

This policy has been devised in accordance with the following legislation and guidance:

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**Safeguarding children and young people**

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[Keeping children safe in education Sep 2024](#)  
[Working together to safeguard children Updated July 2024](#)  
[Multi-agency statutory guidance on female genital mutilation July 2020](#)  
[Disqualification under the Childcare Act 2006 August 2018](#)  
[Promoting the education of looked-after and previously looked-after children Feb 2018](#)  
[Supervision of activity with children Sep 2012](#)  
[Children Act 1989: court orders April 2014](#)  
[Children Act 1989: care planning, placement and case review July 2021](#)  
[Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism \(HM Government: updated 2020\)](#)  
[Statutory framework for the early years foundation stage, March 2021](#)

## Special educational / health needs

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- [SEND code of practice: 0 to 25 years April 2020](#)
- [Supporting pupils with medical conditions at school, Aug 2017](#)

## Behaviour and attendance

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[Children missing in education Aug 2024](#)

This policy has also been drawn up with reference to the following:

- [Education \(Independent School Standards\) \(England\) Regulations \(2014\) and \(January 2015\)](#)
- [Preventing and tackling bullying \( DfE 2017\)](#)
- [DfE and ACPO drug advice for schools](#)
- [Domestic Violence and Abuse](#)
- [The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage \(HM Government: Feb 2023\)](#)
- [National action plan to tackle child abuse linked to faith or belief](#)
- [No Health Without Mental Health strategy](#)
- [Children and families Act \( 2014\)](#)
- [Safeguarding children in whom illness is fabricated or induced](#)
- [Sharing nudes and semi-nudes advice for education settings working with children and young people December 2020](#)

- [Behaviour in Schools-A guide for headteachers and School Staff September 2022](#)
- [Use of reasonable force-Advice for teachers, staff and governing bodies July 2013](#)
- [Meeting digital and technology standards in schools and colleges March 2023](#)
- [Keeping Children Safe in Out of School Settings Oct 2020](#)
- [Multi-agency practice principles for responding to child exploitation and extra-familial harm - Department for Health and Social Care and the Ministry of Justice](#)
- [Searching, screening and confiscation at school, July 2022](#)
- [CODE C Revised Code of Practice for the detention, treatment and questioning of persons by Police Officers, Aug 2019](#)
- [Developing and implementing a low-level concerns policy \(Farrer & Co\)](#)

### **Policy created in 2015.**

Policy reviewed in:

June 2025  
 November 2024  
 August 2023  
 August 2022  
 April 2022  
 November 2021  
 May 2021  
 November 2020  
 September 2020  
 April 2020  
 November 2019  
 September 2018  
 January 2018  
 June 2017  
 March 2017  
 January 2017  
 May 2016  
 August 2016  
 November 2016