Safeguarding and Child Protection
Policy and Procedures

Ratified: April 2023

Updated: September 2024, September 2025, October 2026

Due for Review: August 2027

Contents

Safeguarding Statement 2025/Disclaimer 4

Key Personnel 4

Terminology 4

Introduction 5

Equalities Statement 6

Policy Aims 7

Policy Principles and Values 7

Safe School, Safe Staff: 9

The Head of Teaching and Learning: 11

The Designated Safeguarding Lead: 12

Confidentiality, Sharing and Withholding Information 15

Reporting and responding to safeguarding concerns 15

Dealing with safeguarding concerns 16

Safeguarding concerns and allegations made about staff, including supply teachers, volunteers, and contractors 18

Low-level concerns 19

What is child abuse? 19

Sexual violence and sexual harassment between children in the school 21

Child-on-Child Abuse 21

Harmful Sexual Behaviour (HSB) 24

Anti-Bullying/Cyberbullying 25

Safety/Cybercrime 25

Racist Incidents 25

Radicalisation, Extremism and Terrorism 25

Domestic Abuse 26

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) 27

Child Sexual Exploitation (CSE) 27

Child Criminal Exploitation (CCE) 28

Serious Violence 28

Modern Slavery 28

Female Genital Mutilation (FGM) 24

Forced Marriage 24

Looked After Children and Previously Looked After Children 25

Children with special educational needs and disabilities or health issues 25

Children Missing Education 25

Pupils Missing Out on Education (PMOOE) 26

Attendance and Behaviour 26

Restrictive Physical Intervention 26

Whistleblowing 27

Appendix one: 28

Appendix two: Brook sexual behaviours traffic light tool 29

Safeguarding Statement

'Safeguarding is Everyone's Business'

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide an environment in which children and adults feel safe, secure, valued, and respected, and feel confident to talk if they are worried, believing they will be effectively listened to. The purpose of this policy is to provide staff, volunteers, and Advising Board member in charge with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

The International School of Morocco, as a British school, complies with legal legislation in Morocco. If any of the articles herewith is in contradiction with the Moroccan legislation, Moroccan legislation will prevail.

Key Personnel
The Designated Safeguarding Lead (DSL) is:
Donna Lee Williams

The Deputy Designated Safeguarding Lead (DDSL) is:
Younes Mellouki

Terminology

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment.
- preventing impairment of children's health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.
- Preventing impairment of children's mental or physical health or development.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Early help means providing support as soon as any needs emerge or are identified at any point in a child's life.

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

Child(ren) includes everyone under the age of 18. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, and adoptive parents.

DSL, where appropriate, refers to Deputy Designated Safeguarding Lead (DDSL)

Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015; the Apprenticeships, Skills, Children and Learning Act 2009 (as amended), and Working Together to Safeguard Children (2026).

All action taken by The International School of Morocco will be in accordance with Moroccan Law. However, as much as possible, we try to adhere to the:

UK Statutory, national, and local guidance – this includes:

- What To Do If You're Worried A Child is Being Abused (2015)
- Working Together To Safeguard Children (2026) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- Keeping Children Safe in Education 2026 is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children
- Early years foundation stage (EYFS) statutory framework (2021) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered schools.

This policy applies to all members of staff and Advising Board member in charge in the school.

Guidance and documents referred to in this policy:

- Working Together To Safeguard Children (2026)
- Keeping Children Safe in Education 2026
- Disqualification under the Childcare Act 2006 (updated 2019)
- Reporting of female genital mutilation: procedural information
- What To Do If You're Worried A Child Is Being Abused (2015)
- Teachers' Standards
- Information sharing advice for safeguarding practitioners
- Equality Act 2010: guidance
- Early years foundation stage (EYFS) statutory framework

Equalities Statement
General duties include:

- Eliminate discrimination, harassment, and victimisation,
- Advance equality of opportunity between people who share a protected characteristic,
- Foster good relations across all protected characteristics,

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy.

The International School of Morocco also adheres to the principals of and promotes anti-oppressive practice in line with the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

Policy Aims

The aims of these procedures are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school and ensure that safeguarding follows a whole school approach.
- Clarifying safeguarding expectations for members of the school's community, staff, proprietors' representative, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the school built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.
- Supporting contextual safeguarding practice recognising that the school's site can be a location where harm can occur.
- School expectations for developing knowledge and skills within the school's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies where appropriate.

Policy Principles and Values

- The welfare of the child is paramount
- Maintain an attitude of "It could happen here"
- Maintain a zero-tolerance approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, considering contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the school will work openly with parents/carers as far as possible, it reserves the right to contact the relevant local authority without notifying parents/carers if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Our school will:

- Provide a safe place and stability in the lives of children who have been abused or who are at risk of harm. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Promote a caring, safe, and positive environment within the school.
- Encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- Ensure children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education through most aspects of school life, including staying safe online.
- Respond sympathetically to any requests for time out to deal with distress and/or anxiety.
- Offer details of helplines, counselling, or other avenues of external support.
- Liaise and work in partnership with other support services and agencies involved in early help and the safeguarding of children.
- Notify relevant local authorities without delay if there is an immediate risk of significant harm.
- Provide continuing support to children about whom there are concerns and who leave the school by ensuring that information is shared confidentially with the child's new school. We will ensure records are forwarded as a matter of priority and within statutory timescale.
- Recognise that we play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends, and an ethos of protection.

Our staff will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk, and are always listened to.
- Include regular consultations with children e.g. through questionnaires, participation in anti-bullying activities, asking children to report whether they feel safe in the school.
- Ensure that all children know they can access an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to keep themselves and other safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.
- Ensure all staff are aware of the school's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

We will ensure that:

- The school operates safer recruitment procedures in line with KCSIE 2026 which includes statutory checks on the suitability of staff to work with children.
- All staff receive information about the school safeguarding arrangements, the school's safeguarding statement, staff behaviour policy (code of conduct), Safeguarding and Child Protection policy, the role, and names of the Designated Safeguarding Lead (DSL), and Keeping Children Safe in Education 2026 part 1 and annex B.
- All staff receive safeguarding and child protection training (including online safety) at induction. Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- All members of staff are reporting concerns.
- All members of staff maintain a zero-tolerance approach to violence and harassment.
- All staff and Proprietors' representative have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Safeguarding and Child Protection Policy is made available via the school website and a paper copy is available upon request for parents/carers.
- All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.
- Provide a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- The school's lettings policy will seek to ensure the suitability of adults working with children on the school site at any time and ensure that any groups who use the school's premises have Safeguarding and Child Protection policies and procedures in place.
- Community users organising activities for children are aware of the school's Safeguarding and Child Protection Policy, guidelines, and procedures.
- The name of the designated members of staff for safeguarding and child protection, the DSL and DDSL are clearly advertised in the school.

All Staff will:

- Maintain an attitude of "It could happen here" with regards to safeguarding.
- Understand that safeguarding is everyone's responsibility.
- Maintain a zero-tolerance approach to violence and harassment.
- Read and understand Part 1 of statutory guidance KCSIE (2026).
- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; the Staff Behaviour Policy (code of conduct); and the role of the DSL.
- Know who and how to contact the DSL, the DDSL, the Director, the Proprietors representative, who are responsible for safeguarding.
- Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of

abuse and neglect so that staff are able to identify cases of children who may need help or protection.

- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

    - ❖ who may be experiencing abuse or neglect
    - ❖ requiring mental health support
    - ❖ may benefit from early help
    - ❖ where there is a radicalisation concern
    - ❖ where a crime may have been committed

- Provide a safe environment in which children can learn.
- 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 who they can approach if they are worried or have concerns.
- All staff 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.
- Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-today and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child Protection Policies and procedures.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2026), and 'What to do if you are worried a child is being abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day.
- Be prepared to refer directly to a relevant local authority, if there is a risk of significant harm and the DSL is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2026, if the disclosure is an allegation against a member of staff, supply staff, volunteer, or contractor.
- Report low-level concerns (as defined in KCSIE 2026) about any member of staff/supply staff/volunteer or contractor to the DSL and/or Director.
- Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard

vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Notify the DSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.
- Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or language barriers.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The Head of Teaching and Learning:

In addition to the role and responsibilities of all staff the Teaching and Learning Leader will ensure that:

- The Safeguarding and Child Protection Policies and procedures are implemented and followed by all staff.
- That the school has appropriate policies in place that make it clear that harassment, online abuse, and violence is unacceptable, with appropriate sanctions and support in place.
- That the school's staff have appropriate knowledge of KCSIE (2026) part 5.
- That all children are supported to report concerns about harmful behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. Comprehensive records of all allegations are kept.
- All staff are aware of the role of the DSL, including the identity of the DSL.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other interagency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are considered when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.

- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE.

Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

The Designated Safeguarding Leads:

Details of the DSL and DDSL are available on the school website, notice boards in school and in reception. Further details of DSL duties are further outlined in KCSIE (2026, Annex B).

In addition to the role and responsibilities of all staff the DSL and DDSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) in the school, this responsibility is not able to be delegated.
- Work in partnership with other agencies in line with Working Together to Safeguard Children (2026).
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism. If the matter is urgent then the relevant local authorities must be contacted
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with the relevant local authority for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.
- Follow relevant DfE guidance and KCSIE 2026 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the school.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role.
- Have a secure working knowledge of procedures and understand the assessment process for providing early help and statutory intervention.
- Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.

- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support the school's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with school staff (especially pastoral support, behaviour leads, school's health colleagues and the SENDCO) on matters of safety and safeguarding to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at the school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at the school.
- Keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.
- Ensure that where a child transfers to a school and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new school immediately.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Director any significant issues.
- Ensure that explanation is sought for any child currently with a child protection plan who is absent.
- Ensure each member of staff has access to, and understands, the schools Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- Ensure that in collaboration with the school leadership and proprietors' representative, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and leadership staff.

Confidentiality, Sharing and Withholding Information
All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance. The school will refer to the guidance in the Data protection: toolkit for schools to support school with data protection activity, including compliance with General Data Protection Regulation (GDPR).
Information will be shared with staff within the school who 'need to know'.
Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.
All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

Reporting and responding to safeguarding concerns
The following procedures apply to all staff working in the school and will be covered in training to enable staff to understand their role and responsibility.
The aim of the procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.
The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.
All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.
The school may refer the child or report the case to external child services such as:

- Touche pas à mon Enfant (https://www.assohelp.org/asso-37-association-touche-pas-a-mon-enfant)
- Internet Watch Foundation (https://report.iwf.org.uk/ma)
- Morocco Cyberconfidence space (https://cyberconfiance.ma/fr/)

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

Make an initial record of the information related to the concern as soon as possible. This will most commonly be on paper. The record needs to include details of:

- Date
- Time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the child's words)
- Demeanour/non-verbal behaviours of the child
- Any injuries
- Rationale for decision making
- Actions taken

Report it to the DSL immediately.

The DSL will consider if there is a requirement for immediate medical intervention; however, urgent medical attention should not be delayed if the DSL is not immediately available.
The records must be signed and dated by the author or/equivalent.
In the absence of the DSL, staff must be prepared to refer directly to the relevant local authority if there is the potential for immediate significant harm.

Following a report of concerns:

The DSL must decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the relevant local authority. The school should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the local authority. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the relevant local authority whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered. If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the relevant local authority and/or police.

When a child needs urgent medical attention and there is suspicion of abuse the DSL should contact an ambulance to take the child to the accident and emergency unit at the nearest hospital, having first notified the relevant local authority. The DSL should seek advice about what action the relevant local authority will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

Dealing with safeguarding concerns

All staff:

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
All staff should know who the DSL is. All staff have the right to make a referral to the relevant local authority directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles, the seven R's

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the child, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the child only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the child may care about him/her, and reconciliation may be possible
- Do not ask the child to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the child that it will be a senior member of staff

Report

- Share concerns with the DSL immediately.
- If you are not able to contact your DSL, and the child is at risk of immediate harm, contact the relevant local authority directly.
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

Record

- If possible, make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues

- Get some support for yourself if you need it

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they believe that the concern has not been acted upon appropriately, they should contact the Advising Board member in charge as the next step.

Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors

- this procedure will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children 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
❖ behaved or may have behaved in a way that indicates they may not be suitable to work with children.
The last bullet point above includes behaviour that may have happened outside of the school that might make an individual unsuitable to work with children, this is known as transferable risk.

In dealing with allegations or concerns against an adult, staff must without delay:

- Report any concerns to the DSL immediately.
- If an allegation is made against the DSL, the concerns need to be raised with the Deputy Designated Safeguard Lead, and the Director, as soon as possible. If it is made against the Director, it needs to be raised with the Advising Board member in charge.
- There may be situations when the DSL, or the Director will want to involve the Police immediately, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the DSL, and/or the Director, they will contact the relevant local authority immediately and before taking any action or investigation.

- Following consultation with the police, inform the parents/carers of the allegation unless there is a good reason not to.
- In liaison with the police, the school will determine how to proceed.

Low-level concerns

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the police.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust, and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored, and reinforced constantly by all staff.

The school creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the DSL and/or the Director in a timely manner. If the DSL has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the Director.

What is child abuse?

The following definitions are taken from Working Together to Safeguard Children 2026). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage, or female genital mutilation.

Forms of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

Children may be abused in a family or in an institutional or community school by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For further information on indicators of abuse can be accessed via Types of Child Abuse & How to Prevent Them | NSPCC.

Sexual violence and sexual harassment between children in the school

Child-on-Child Abuse

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adults, and school staff are supported and protected as appropriate.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- sharing of nude and semi-nude images and/or videos – including AI generated images using a person's likeness (also known as sexting or youth produced sexual imagery). Sharing nudes and semi-nudes: advice for education settings working with children and young people, upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

See appendix one for detailed definitions.

We believe that all children have a right to attend our school and learn in a safe environment. Children should be free from harm by adults and other children at The International School of Morocco.

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSIE (2026).

We are clear that sexual violence and sexual harassment is not acceptable.

We will minimise the risk of child-on-child abuse by:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. We believe that dismissing or tolerating such behaviours risks normalising them.

Prevention

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.

Responding robustly to reports of sexual violence and sexual harassment

Children making any report of sexual violence or sexual harassment including "upskirting" (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.
If the report includes an online element staff will be mindful of the Searching, screening and confiscation at school guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Action:
It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.

- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

Confidentiality:

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment.
The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to the relevant local authority, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the relevant local authority.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

Options:

- Manage internally
- Early help intervention
- Report to the relevant local authority

All concerns, discussions, decisions and reasons for decision will be recorded and all paperwork will be kept on file.

Ongoing Response:

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on the school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which

may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the Director should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The school recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the relevant local authority.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

The Brook Traffic Light Tool uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the school can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

Anti-Bullying/Cyberbullying

Our school's policy on anti-bullying includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is shared with and analysed by the Proprietors' representative.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the DSL will also consider child protection procedures.

PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

Safety/Cybercrime
The school has an online/cyber safety policy which empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. This policy covers the use of mobile and smart technology.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

Children are taught about online safety throughout the curriculum.

Racist Incidents
Our policy on racist incidents acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

Radicalisation, Extremism and Terrorism

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

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

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous. This can happen both online and offline.

We are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the DfE guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL contacting parents, or local authorities.

Opportunities are provided in the curriculum to enable children to discuss issues of ethnicity and culture and the school follows the Promoting fundamental British values through SMSC.

Our Advising Board member in charge, Director, and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at Radicalisation and Extremism - Examples and Behavioural Traits (educateagainsthate.com)

Domestic Abuse
Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic Abuse Act received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can

affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The school is aware there is a clear link between regular non-attendance and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at and make reasonable enquiries with the child and parents/carers to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases if the DSL identifies any level of concern the DSL should contact the relevant local authority.

The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Child Criminal Exploitation (CCE)

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

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the relevant local authority.

The school is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular nonattendance at school and make reasonable enquiries with the child and parents/carers to assess this risk.

Serious Violence
There are a number of indicators which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend the school which includes travelling to and from the school.

Modern Slavery
Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. We will act within the bounds of Moroccan law in this case.

Female Genital Mutilation (FGM)
ISM recognises that FGM is a form of child abuse and violence against women. There are no circumstances in which a member of staff should examine a girl. We will act within the bounds of Moroccan law in this case.

Forced Marriage
ISM recognises that forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse. School staff should never attempt to intervene directly as a school or through a third party. We will act within the bounds of Moroccan law in this case.

One Chance Rule

Staff recognise they may only have one chance to speak to a child who is a potential victim and have just one chance to save a life.

The school is aware that if the victim is not offered support following disclosure that the ‘One Chance’ opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential cases.

Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is because of abuse and/or neglect.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Children with special educational needs and disabilities or health issues

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children he potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so

Any reports of abuse will require close liaison with the DSL and the SENDCO. The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Children Missing Education

All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

The school recognises that children missing education can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment, or training (NEET) later in life.

Where possible the school will hold more than one emergency contact number for each child.

The school will ensure that there is a record of joiners and leavers.

The school will make reasonable enquiries to establish the whereabouts of a child, before deleting the child's name from the school register.

The school will:

- Enter children on the admissions register on the first day on which the school has agreed, or has been notified, that the child will attend the school.
- Monitor each child's attendance through their daily register
- Remove a child's name from the admissions register on the date that the child leaves the school.

Pupils Missing Out on Education (PMOOE)

Most children engage positively with school and attend regularly. However, to flourish, some children require an alternative education provision or may require a modified timetable to support a return to full-time education provision. It is recognised that children accessing alternative provision, or a reduced/modified timetable may have additional vulnerabilities. Ofsted refer to these as PMOOE because they are not accessing their education in school in the 'usual way'.

The school will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable.

The school will ensure that parents/carers are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

The school will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it.

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The school continues to be responsible for the safeguarding of that pupil.

The school leadership will report to the Proprietors' representative information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The school will also report to the Proprietors' representative any formal direction of a child to alternative provision to improve behaviour.

Attendance and Behaviour

Additional policies and procedures are in place regarding school attendance and behaviour.

The school recognises that absence from and exclusion from may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly ensure risk is identified and appropriate intervention is in place to protect children from harm.

Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force

necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

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

We recognise that sometimes touch is appropriate in the context or working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

The school has a separate Whistleblowing policy.

Whistleblowing regarding the Head of Teaching and Learning/DSL should be made to the Director and regarding the Director to the Advising Board member in charge whose contact details should be available to staff.

Appendix one:

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
- sharing of nude and semi-nude images and/or videos.
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that schools consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Appendix two: Brook sexualised behaviours traffic light tool

Behaviours: age 0 to 5

All green, amber, and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies,
- doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- preoccupation with adult sexual
- behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

This is intended to be used as a guide only. Please refer to the guidance tool at https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.
Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

Behaviours aged 5 to 9 and 9 to 13

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in
- sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger
- children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

This is intended to be used as a guide only. Please refer to the guidance tool at https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool for further information
Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.
Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.