

# Child Protection and Safeguarding Policy

## I. Policy Statement and Principles:

St George's International School Luxembourg recognises its duty and responsibilities to promote the protection, welfare and safeguarding interests of all students. The school recognises that effective student safeguarding requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to student safeguarding situations.

This policy is one of a series in the school's integrated safeguarding portfolio. This includes policies for:

Anti-Bullying	Child-on-Child Abuse
Behaviour & Discipline	Drugs, Smoking and Alcohol
Exclusions	Health, Safety and Welfare
Photographic and Video Images	RSHE
Safer Recruitment	SMSC
Student Wellbeing	Acceptable Use Policy

This policy is available on the school website and is included in the staff portal.

Our core safeguarding principles are:

- safeguarding is everyone's responsibility
- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance makes an interim review appropriate.

### 1. Child Protection Statement:

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the local safeguarding arrangements of the Grand Duchy of Luxembourg.

## 2. Policy Principles:

- The welfare of the child is paramount.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.
- Students and staff involved in child protection issues will receive appropriate support.

## 3. Policy Aims:

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice.
- To demonstrate the school's commitment regarding child protection to students, parents and other partners.

### Terminology

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

**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.

**DSL** refers to the designated safeguarding lead at the school

**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.

**SST** refers to the Student Safeguarding Team

**CPOMS** refers to the software solution for monitoring Safeguarding, wellbeing and all pastoral issues.

## 4. Safeguarding Legislation and Guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Safeguarding Vulnerable Groups Act 2006
- The Teacher Standards 2012
- Section 47 of the Children Act 1989
- Working Together to Safeguarding Children 2018
- Working Together: Transitional Guidance 2018
- Keeping Children Safe in Education 2021
- What to do if you're worried a child is being abused 2015.
- The Domestic Abuse Act 2021

## 5. Roles, Responsibilities, Reporting:

### Student Safeguarding Team (SST) for 2023/2024 are:

The Deputy Designated Safeguarding Leads

- Dr Christian Barkei – Principal  
principal@st-georges.lu
  - Emma Kelton– Primary  
primarysafeguarding@st-georges.lu
    - Claire Nuttall – Primary  
primaryhead@st-georges.lu
      - Sarah Roe – Secondary  
DOKS5@st-georges.lu
        - Claire Simmonds – Secondary  
secondaryhead@st-georges.lu

Designated Safeguarding Lead for 2023/2024 is:

- Fiona Ramage  
f.ramage@st-georges.lu
- Chair of the Board of Governors:
- Stefan Ziegenhagen  
[chair@st-georges.lu](mailto:chair@st-georges.lu)

Governor in charge of Safeguarding for 2023/2024 is:

- Mia Aouadi  
safeguarding@st-georges.lu

**In an emergency, please call the school on 00352 423224 and ask to be connected to the Designated Safeguarding Lead Fiona Ramage, or the Principal Dr Barkei.**

**In the case of an allegation regarding the Principal, please contact the Chair of Governors or the Governor in charge of safeguarding immediately.**

**Concerns regarding a student must be reported using the CPOMS system as soon as possible. Every member of staff receives training in this system and it is essential that all staff are familiar with it. Alternatively, any of the SST team members can be contacted directly; Child Protection issues are treated as an absolute priority.**

## **6. The Designated Safeguarding Lead (DSL):**

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection in the school. The DSL has the authority within the school to carry out the duties of the post, which include:

- ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publicly available
- advising and supporting staff on child protection and safeguarding matters
- encouraging a culture of listening to children
- managing safeguarding referrals to children's social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaising with the "case manager" and the designated officer(s) at the local authority where allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child's new school
- under-going training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

## **7. The Deputy Designated Safeguarding Leads:**

Are trained to the same level as the DSL and support the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSLs carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, the deputies will assume the functions above.

## **8. Good Practice Guidelines and Staff Code of Conduct:**

Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students

- being a good listener
- being alert to changes in student behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some students may lead to an increased risk of abuse
- referring all concerns about student safety and welfare to the SST via CPOMS
- If the issue is with an Embassy student we will contact the CLO (Community Liaison Officer) or the appropriate person, at the relevant embassy.

## **9. Abuse of Position of Trust:**

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence. The Luxembourg penal code has similar provisions.

## **10. Children Who May be Particularly Vulnerable:**

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our students receive equal protection, we will give special consideration to children who are:

- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic violence or parental mental health needs
- vulnerable to being bullied, or engaging in bullying
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- do not have English as a first language
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

## **11. Children with Special Educational Needs and Disabilities**

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

## **12. Children Missing Education**

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor unauthorised absence and take appropriate action including notifying the local commune, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **13. Mental Health:**

Schools have an important role to play in supporting the mental health and wellbeing of their students.

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy.

## **14. Whistleblowing if you have concerns about a Colleague:**

Staff who are concerned about the conduct of a colleague or a volunteer towards a student are placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise

their colleague's career or the position of the volunteer at the school. All staff must remember that the welfare of the child is paramount. The school's whistleblowing code enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

**All concerns of poor practice or possible child abuse by colleagues or volunteers must be reported to the Principal immediately and without delay. Complaints about the Principal should be reported to the Chair of Governors.**

## **15. Allegations and Concerns Raised in Relation to Staff, Supply Staff, Contractors and Volunteers:**

When an allegation is made against a member of staff, including supply staff, contractors or volunteers, our set procedures must be followed. The full procedures for dealing with allegations against staff and managing low level concerns raised about staff can be found in *Keeping Children Safe in Education (DfE, 2022)*.

Allegations concerning staff who no longer work at the school, or historical allegations, will be reported to the Luxembourg police.

## **16. Staff Training:**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation, online safety and to know what to do if they have a concern.

Newly appointed staff will be required to complete the online 'Child Protection for International Schools' Educare programme of study (unless they already have an up-to-date Level 1 Child Protection Certificate as a minimum certification) and to read the School's Child Protection and Student Safeguarding Policy as part of their induction programme. In addition, the School runs face-to-face Level 1 Basic Awareness training for all staff who join the School throughout the year on a fortnightly basis.

All staff are required to read the policy annually. All staff are to have an up-to-date certification in Child Protection by completing the online 'Child Protection Refresher' Educare programme of study. Certification of this is recorded on staff records and is completed yearly. This training updates staff on the most current Keeping Children Safe in Education guidance.

The Senior Management Team (SMT) will receive Level 3 training every two years. The School will extend Level 2 training to other members of staff as appropriate.

The Student Safeguarding Team (SST) will receive Level 3 training every two years. In addition to this the team meets formally every month for group supervision. SST also attend CPD relevant to their role.

All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

## **17. Safer Recruitment:**

When recruiting new members of staff the school follows the guidance given in the "2" guidelines and St George's own procedures for recruitment in set out in the School Safer Recruitment Policy.

The following checks are undertaken as a minimum:

- Verification of employment history through CVs and standardised application forms
- ICPC checks (International Child Protection Certificate) are undertaken
- All references are taken up and qualifications are verified with issuing institutions
- Additional checks will be carried out as necessary.

The school maintains a single central record of recruitment checks undertaken.

### **Volunteers:**

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with students and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

### **Contractors:**

The school checks the identity of all contractors working on site. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

## **18. Site security:**

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Principal will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **19. Extended school and off-site arrangements:**

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.



When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

## **20. Staff/student online relationships:**

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students. Staff should never maintain any form of online relationship with a student other than through the school digital applications e.g. Microsoft Teams. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

## **II. Child Protection Procedures**

### **1. Recognising abuse:**

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education (DfE 2021) refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

### **2. Bullying:**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed in our Anti-Bullying Policy.

### **3. Taking action**

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

#### **Key points for staff to remember for acting are:**

- **in an emergency take the action necessary to help the child**

- **report your concern as soon as possible to the SST via CPOMS, definitely by the end of the day**
- **do not start your own investigation**
- **share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family**
- **complete a record of concern on CPOMS**
- **seek support for yourself if you are distressed.**

See Appendix 2 for procedures.

#### **4. If you are concerned about the welfare of a student:**

There will be occasions when staff may suspect that a student may be at risk. Behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns. If the student does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation, if the member of staff has concerns, they should discuss their concerns with the DSL and record on CPOMS.

#### **5. If a student discloses to you:**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will, at the appropriate time, let the student know that in order to help them they must pass the information on to the SST.** The point at which they tell the student this is a matter for professional judgement. During their conversations staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the

student's mother think about it

- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong
- tell the student what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete CPOMS and alert the SST as soon as possible
- seek support if they feel distressed.

**a) Notifying parents:**

The school will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the SST will contact the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the student. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from the Grand Ducal Luxembourg police specialist unit before parents are contacted.

**b) Confidentiality and sharing information**

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the SST, Principal or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Following several cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2021)* emphasises that **any** member of staff can contact the Grand Ducal Luxembourg Police if they are concerned about a child.

Child protection information will be stored and handled in line with our Data Retention Policy.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Any written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the data protection officer.

## **6. Record keeping**

Well maintained records are essential in situations where it is suspected or believed that a student may be at risk from harm.

Records should:

- State who was present, time, date and place and the length of time spent with the student;
- Use the student's words wherever possible;
- Be factual/state exactly what was said;
- State what action was taken at the time or any inaction (what you witnessed but did not act upon)
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation;
- Be written in ink and signed by the recorder;

The Designated Safeguarding Lead (DSL) will review the handling, efficiency of dealing with, and recording of all student safeguarding related matters annually.

If a member of staff has been convicted of abuse by a court in Luxembourg, the school may report this to the authorities in the UK that are charged with ensuring that unsuitable individuals do not come into contact with students. If a member of staff is dismissed for reasons of suspected abuse, the School will pass the evidence to the Luxembourg authorities for their action.

Student records may be kept until the individual has reached 25 years of age.

## **7. Referral to the Police**

The DSL and the Principal will make a referral to the Grand Ducal Luxembourg Police if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to the Grand Ducal Luxembourg Police if they genuinely believe independent action is necessary to protect a child.

## **8. Child-on-Child Abuse:**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where

necessary. However, all staff recognise that children can abuse their peers and should be clear about the school's policy and procedures regarding child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse can take many forms, including:

- **physical abuse** such as shaking, biting, hitting, kicking or hair pulling
- **bullying**, including cyberbullying, prejudice-based and discriminatory bullying
- **sexual violence and sexual harassment** such as inappropriate sexual language, touching, sexual assault or rape
- **causing someone to engage in sexual activity without consent**, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)** including pressuring another person to send sexual imagery or video content
- **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- **upskirting** – taking a picture under a person's clothing without their permission for the purposes of sexual gratification or to cause humiliation, distress or alarm
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Tolerance of such behaviours can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. However, all staff recognise that it is more likely that girls will be victims of child-on-child abuse and boys are more likely to be the perpetrators.

Staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but simply not being reported.

Please see Child-on-Child Abuse Policy for full details of preventative measures and management of allegations.

The support required for the student who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the student that harmed. We will seek to understand why the student acted in this way and consider what support may be required to help and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

## **9. Serious violence:**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, 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 could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

## **10. Child criminal exploitation (CCE) and child sexual exploitation (CSE):**

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance of 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. This power imbalance can be due to a range of factors, including age, gender sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

The school includes the risks of criminal exploitation and sexual exploitation in the PSHE and SRE curriculum. A common feature of such exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. The child may initially resent what they perceive as

interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

### **a) Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. 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. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

All staff are made aware of the indicators of sexual exploitation which, as well as including the indicators set out under CCE below, can also include having older boyfriends and suffering sexually transmitted infections or becoming pregnant. All concerns are reported immediately to the DSL.

### **b) Child Criminal Exploitation (CCE)**

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator can include children who:

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol
- go missing for periods of time or regular return home late
- regularly miss school or education or do not take part in education.

## **11. Online safety**

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to students, who can contact our students and the personal conduct of our students online. We have also ensured that appropriate level of security protection procedures are in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Online safety risks can be categorised into four areas of risk:

- **content** - being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **contact** - being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **commerce** - risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.



## **12. Sharing nudes and semi nudes**

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or done offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the SST immediately and the SST will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police, and once a report is made to the police, the report must be recorded, and the police will take over the investigation. This may include seizure of devices and interviews with the young people involved.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 – [UKCIS advice 2020](#). The school will have regard to this advice when managing these issues.

### **13. Domestic abuse**

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial, economic and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Any child can witness and be adversely affected by domestic abuse in their home life. Experiencing domestic abuse can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child.

All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

### **14. Honour-based abuse**

'Honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. Staff and the DSL are aware of this dynamic and will consider it when deciding what safeguarding action to take.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

Children may be married at a very young age, and below the age of consent in Luxembourg. School staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to Luxembourg.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

## **15. Radicalisation and extremism**

The UK government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Although rare in Luxembourg, these activities and tendencies have been identified in France, Belgium, Germany and the Netherlands.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

## **16. Special Circumstances**

### **a) Looked after children**

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. 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. The DSL has details of the child's social worker and the contact details of the local communal authority.

### **b) Children who have a social worker**

Children may need a social worker due to safeguarding or welfare needs. Communes will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the child's welfare.

### **c) Work experience**

The school has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (2022)*.

### **d) Children staying with host families**

The school may arrange for students to stay with a host family during a foreign exchange trip or sports tour. Some foreign students may reside with host families during school terms and we will check that such arrangements are safe and suitable.

Where students stay with families internationally, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard students, which will include ensuring students understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

## **III. Resources, Training and Review**

### **1. Resources**

Safeguarding is important to all members of staff. The Senior Management Team (SMT) ensures that sufficient resources are made available to enable the necessary tasks to be carried out properly including attending meetings, collating and writing assessment reports, and staff training.

Safeguarding awareness will be addressed through the curriculum as appropriate to ensure all students understand what is meant by safeguarding and how they can be safe.

## **2. Monitoring and Review by the Board of Governors**

An annual review of this policy is undertaken by the Senior Management Team (SMT) together with the appointed Governor for Safeguarding and ratified by the Board of Governors. If the policy needs to be amended beforehand, the SMT, in consultation with the SMT, has responsibility for immediate implementation.

The Board of Governors will ensure that they comply with their duties and ensure that the policies, procedures and training in the school are effective and comply with Luxembourg law.

A member of the Board is formally nominated to liaise with agencies on issues of child safeguarding and in the event of allegations of abuse against a Head Teacher or the Principal.

The Governor in charge of Safeguarding will review the Child Protection Policy and Procedures together with the Principal and the DSL annually. They will also examine the Single Central Register (SCR) and the effectiveness of the School Safer Recruiting Policy with the Finance and Administration Manager every term at school and will report to the Board of Governors at the next Board meeting on this review. Any necessary remedial action will be carried out as a matter of urgency.

## **Appendix 1**

### **Four Categories of Abuse:**

#### **Physical**

#### **abuse**

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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

#### **Emotional**

#### **abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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**

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

#### **Neglect**

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 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.

### **Indicators of abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- Acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed.

## Appendix 2

### ***Procedure advice for Student Safeguarding***

- 1. The 'paper trail' is most important, as evidence is needed to take action. For the school, this means that we require evidence in order to take any cases forward to the police and courts in Luxembourg.**
- 2. Any concerns must not be discussed generally. If you have a concern (remember, your instinct and the 'warning bell'), please complete an 'add incident' form in CPOMS. Having done this, if you think it is necessary, please speak to a member of the SST.**
- 3. Respect the student's rights to confidentiality. If there is an incident involving a student, the only people that need to know are people directly involved with the student in that situation. Other people who may need to know something as a consequence to the situation, only need to know that there has been a situation, they do not need to know the reason why.**
- 4. Do not discuss the CPOMS referral (before or after completion) or fill this out in an area where other people can witness this. Worst case scenario – the person witnessing you filling in this form could be the perpetrator and you are letting them know your suspicions are aroused.**
- 5. Please remember that it should only be facts on the form, opinions are not evidence and are not admissible in a court. Any notes or further evidence can be uploaded as a file in the CPOMS form.**
- 6. Include on the form any action taken at the time and any inaction also (i.e. what you witnessed but did not act upon)**
- 7. Complete CPOMS 'add incident' form within 24 hours and click on the button alert 'SGIS Safeguarding Team'. Any follow up to the form will be carried out by the SST as necessary and your role in the matter is complete. Further evidence or concerns need to be filled in on another CPOMS form. However, without the forms, we cannot take action. It is far better to have a number of CPOMS forms as evidence.**
- 8. Please remember that any queries or information being sent about a student via email should be marked 'CONFIDENTIAL'.**
- 9. The SST will take responsibility for contacting outside agencies or the Luxembourg authorities. You should not contact them directly on student safeguarding matters unless it is an emergency and there is an immediate risk.**





Appendix 3

Date/Time  
Sun 11 July 2021 4:17PM  
Please select the date and time that your concern was first noted.

Files  
Click to browse or drag a file to upload

Alert Staff Members  
Begin typing a staff member's name  
Safeguarding Team EYFS MIP1 MP2 MP3 KSI KSI4 KSI5 School Nurses

Agency Involved  
Submit Incident

**Step 6:** Add correct **date/time** of your concern. It will default to the date/time you complete the CPOMS form but this is not necessarily the date/time of the incident so please modify.

**Step 5:** **OPTIONAL** – if there are any **files**, perhaps images of a student's work that worries you or a student statement please upload here.

**Step 7:** You need to **alert staff members**. **PLEASE SEE SUPPORT NOTE**.

**Step 8:** Ignore agency involved.

**Step 9:** Click **Submit Incident**. Your concern will immediately be sent to the Safeguarding Team.

**SUPPORT NOTE**

CPOMS – SEPTEMBER 2021

is the student identified as suffering or likely to suffer significant harm?

**Yes** → Record as Safeguarding Incident → Alert Button: Safeguarding Team

**No** → Record as Pastoral Care → Alert Button: EYFS/MP1/MP2/MP3/KSI3/KSI4/KSI5

*if in doubt, please record as both Pastoral and Safeguarding, alerting both Safeguarding Team and relevant Pastoral Team.*

**CPOMS – How do I record a safeguarding concern?**

Please log in to CPOMS, your screen will then look like this:

To add an incident, click 'Add Incident' in orange box:

**Step 1:** Start typing student name (it will come up)

**Step 2:** Type in incident box an outline of your safeguarding concern

**Step 3:** Select **safeguarding and/or pastoral** box by ticking it. **PLEASE SEE SUPPORT NOTE**. There are also a list of subcategories to choose from, this is optional.

**Step 4:** If there is a **linked student** or **students** to your concern please start typing their name (it will come up). You do not need to record multiple CPOMS entries for different students, by doing this the records will link.

**Step 5:**

Body Map (if relevant) can be shown by drop down arrow.

You can mark an injury or area of concern by clicking on the body. A red cross will appear with a number.