



BRINGING OUT THE BEST IN EVERYONE!

NCBIS

SINCE 1978 NEW CAIRO BRITISH INTERNATIONAL SCHOOL

Name of policy	Safeguarding and Child Protection Polict	
Area	Whole school Academic and administration	
Effective date	September 2024	
Date ratified by the board	September 2024	
Review date	September 2025	
Amendments		
Date amended	Amendment	Ratified by
September 2024	<ul style="list-style-type: none">• KCSIE 2024• DfE definition of extremism• Student reporting concerns platform	BoD

Safeguarding Children: Child Protection 2024-2025

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1. School mission, vision and values

1.1.Vision

1.2. In 2027 NCBIS will be the first school of choice in Cairo, providing unrivalled experiences that will enable all students to follow their passions and become successful, caring citizens and leaders in tomorrow’s world.

1.3.Mission

1.4. To be a caring, internationally-minded learning community guided by the philosophy of High Performance Learning and a commitment to continuous self-improvement and reflection.

1.5.Values

Nurture	Community Minded	Bravery	Integrity	Self-Reflection
School is a safe place where we promote equality and justice and develop empathetic learners to grow emotionally and intellectually.	Take pride in being part of something bigger than yourself. Choose compassion and forgiveness and demonstrate generosity.	Stand up and be counted and stand for others, be risk takers learning from mistakes and showing resilience.	Be responsible for your own actions and behave honestly, respectfully and ethically.	Understand and develop self-awareness and consciousness about behaviour, thoughts, attitudes and motivation and have the courage to change.

2. Policy statement

2.1 Purpose and Scope of Policy

NCBIS aims to provide a safe and happy environment for all of our students so that learning can take place in a safe and secure atmosphere. This Safeguarding & Child Protection Policy supports Article 3.1 of the Convention of the Rights of the Child, which states that “in all actions concerning children...the best interests of the child shall be a primary consideration”. We are committed to preventing child abuse and protecting children within our community.

This Safeguarding & Child Protection Guidance sets out to outline the actions that will be taken to ensure that all students are protected from all forms of abuse.

2.2 KCSIE 2024 Updates

The definition of safeguarding has been amended to reflect the changes made in Working Together to Safeguard Children. Paragraph 3 now states “Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children’s mental and physical 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

2.3. Linked Policies to refer to alongside this policy

- Raising Concerns
- Behaviour Policy
- Anti Bullying policy
- Acceptable Use Policy
- Staff Code Of Conduct
- Mental Health and Wellbeing
- Missing Education Policy
- Online Safety Policy
- Mobile Phone Usage Policy

2.4 Policy Aims

We believe that all children have the right to:

- Grow up in a safe, secure and caring environment.
- Be protected from harm – including neglect, abuse and exploitation.
- Be listened to, and heard.
- Be valued in terms of their language, culture, religion, sex and race.
- Be treated as an individual.

There is a collective responsibility of all adults in our community to:

- Ensure that children are protected.
- Provide a safe, secure and caring environment.
- Provide support, encouragement and stimulation to enable each child to reach his/ her full potential.

The School will adhere to the following:

- The School operates safe recruitment procedures.
- There is one Designated Safeguarding Lead, Sam Hurst, with 1 Deputy Safeguarding Lead - Catherine Paradine, augmented by three Senior Leaders with L3 Safeguarding training - Paul Joseph, Paul Jowatt and Ian Midgley.
- Whilst whole-school safeguarding is a shared responsibility, the Principal will recommend a member of the senior leadership team to the Board of Directors, who will appoint a Designated Safeguarding Lead.
- The Principal is responsible for the implementation of safeguarding policies at NCBIS as outlined below.

3. Responsibility for Safeguarding & Child Protection at NCBIS

Board of Directors: hold ultimate responsibility for safeguarding.

The Principal: is responsible for the operational implementation of safeguarding policies, and the recommendation of the appointment of the DSL.

The DSL: manages the daily safeguarding processes and responses and advises the Principal and Board on wider safeguarding issues of compliance.

All Staff: share the responsibility of upholding a culture of safeguarding by being vigilant and reporting and recording concerns using CPOMS.

- Any deficiencies or weaknesses in child protection arrangements will be remedied without delay.
- The Board of Directors are responsible for reviewing and approving the Safeguarding & Child Protection Policy and procedures and their efficient implementation on an annual basis.

- The DSL will inform the Disclosure and Barring Service (DBS) in the UK and any other relevant authority within one month of any staff whose services are no longer used because he or she is unsuitable to work with children.

4. UK Legislation and statutory guidance

This policy is based on the UK Department for Education's statutory guidance, *Keeping Children Safe In Education 2024*, *Working Together to Safeguard Children 2023* and the *Prevent Duty Guidance (England & Wales) 2023*.

5. Safeguarding and promoting the welfare of children means:

1. Protecting children from maltreatment.
2. Preventing impairment of children's mental and physical health or development.
3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
4. Taking action to enable all children to have the best outcomes.

6. Contact details for your DSL and deputy DSL

Designated Safeguard Lead:

Sam Hurst - Deputy Head Secondary - Pastoral sam.hurst@ncbis.co.uk

Deputy DSL:

Catherine Paradine - Deputy Head of Primary - Pastoral catherine.paradine@ncbis.co.uk

7. Equality Statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. All vulnerable young people, with particular regard for those with protected characteristics, are central to this policy.

8. Types of abuse (from KCSIE 2024)

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. **In most cases, multiple issues will overlap with one another.**

8.1 Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who maybe need help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

If staff are unsure, they should always speak to the designated safeguarding lead (or the deputy).

8.1.1 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. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

8.1.2 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.

8.1.3 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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

8.1.4 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. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

8.1.5 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 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.

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

All staff at NCBIS have been advised that if there are any concerns, however small they may appear, they must report these immediately.

9. Mental Health Considerations (KCSIE 2024)

Poor Mental Health could be an indicator of abuse, neglect or exploitation.

- Untrained staff should not make a diagnosis, but can make observations.
- Traumatic experiences can have a lifelong impact on mental health, behaviour and education.

9.1 Children Requiring Mental Health Support:

The Board of Directors and proprietors should ensure they have clear systems and processes in place identifying possible mental health. Including routes to escalate and clear referral and accountability systems. Staff should be aware of our mentoring and counselling services, what they offer, how to refer a student and be involved in the support provided. Referrals to the school counsellor are made through Engage Daybook.

10. Children Missing from Education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of our NCBIS Missing Education Policy.

11. Child Criminal Exploitation: County Lines (Gangs)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adults over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or
- threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

12. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or 80 increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);

- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education.

13. Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. At NCBIS, it may be that we rely on our parent community and extended network to advise the school. The Board Chair or Safeguarding link will inform the DSL at any hour of the evening. The DSL will provide support according to the child's needs and update records about their circumstance.

14. So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the DSL lead (or deputy). As appropriate, they will activate local safeguarding procedures.

15. Forced Marriage in British and Egyptian Law

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Under Egyptian law, marriage must be based on the free and full consent of both parties. Individuals and the school can seek legal recourse by reporting forced marriage to the authorities and/or local family courts.

16. FGM

KCSIE (2024) explains that FGM comprises: "all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences." **It is illegal both in the UK and Egypt**, and a form of child abuse with long-lasting harmful consequences. Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure, from which the DSL will alert the Egyptian authorities.

Any member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

17. Preventing Radicalisation & Extremism

17.1 Definition of radicalisation

The definition of radicalisation is currently under review following a new definition of extremism published on 14th March 2024, as outlined below.

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

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the 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. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, 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 be in need of 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 (or deputy).

17.2 The PREVENT Duty guidance (2023)

'Prevent' is part of the UK government's overall counter-terrorism strategy which is called CONTEST. The aim of Prevent is to reduce the threat from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The

guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

18. Child-on-child abuse

At NCBIS, we recognise that children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms.

This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals. In most cases, the Behaviour Policy will be used to mitigate minor infractions without invoking this policy.

Please see [appendix 7 for additional information and guidelines](#). Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through 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 likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims and perpetrators are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviour risks normalising them.

Staff must report all incidents of child-on-child abuse to the DSL.

19. Sexual Harassment

Is a type of harassment involving the use of explicit or implicit sexual overtones, including the unwelcome and inappropriate promise of rewards in exchange for sexual favors. Sexual harassment includes a range of actions from verbal transgressions to sexual abuse or assault. Harassment can occur in many different settings including face-to-face situations (school, social

setting or home) and online. Harassers or victims may be of any sex or gender and can occur in any key stage. Sexual violence and sexual harassment exist on a continuum and may overlap. Staff should address inappropriate behaviour (even if it appears to be relatively innocuous) as this can prevent escalation in future.

Staff should be aware of the importance of:

- Consent
- Power-imbalance
- Developmental stages
- Harmful sexual behaviour
- How to respond (logging a concern on CPOMS and speaking with the DSL)

19.1 Consent

Consent means giving permission for something to happen or agreeing to do something and being comfortable with that decision. Consent can be revoked at any time and this should be immediately respected. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Staff should be aware that:

- Under-13's cannot consent to sexual activity or sharing of data (GDPR)
- Age of consent is 16 (in the UK) and 18 in Egypt
- Sexual intercourse without consent (on each occasion) is rape
- Making, being in possession of and sharing sexual images is illegal in Egypt

19.2 Harmful Sexual Behaviours

It is vital for professionals to be able to identify normal and abnormal sexual behaviours. A child's sexual behaviour should be considered abnormal if it:

- Occurs at a frequency greater than would be developmentally expected
- Interferes with a child's development
- Occurs with coercion, intimidation, or force
- Is associated with emotional distress
- Occurs between children of divergent ages or developmental abilities
- Repeatedly occurs in secrecy after intervention by caregivers

Children may well not directly verbalise abuse / harmful sexual behaviour. This is more likely to be shown in behaviour, information from another student / staff or an overheard conversation / seen incident. The immediate response of staff should be to:

- Listen carefully
- Reflect the language used

- Be non-judgemental
- Clear about boundaries
- Inform child of how the report will be progressed
- Never ask leading questions
- Always report to DSL

19.3 Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence to do this. The Egyptian Penal Code (2014) was amended to toughen penalties for sexual harassment.

19.4 Sharing Nudes and Semi-nudes

This section refers specifically to images created or shared by young people under the age of 18. **All incidents involving any form of sexualised imagery are a safeguarding concern** (regardless of the age of the person in the photo or if the sexual imagery is text based in nature). The following guidance relates to UK Law (Sexual Offences Act 2003):

- Indecent images (including images of self) are illegal. Indecent images includes but is not limited to:
 - Nude or semi-nude sexual posing
 - Someone nude or semi-nude touching themselves in a sexual way
 - Any sexual activity
 - Someone hurting someone else sexually
 - Sexual activity that includes animals
- It is illegal to possess or distribute 'indecent' images
- Non-consensual sharing of private sexual images or videos (at any age) with the intent to cause distress is illegal

Whilst children and young people creating and sharing images can be risky it is often a result of natural curiosity about sex and their exploration of relationships, therefore may not always be 'harmful'. In many cases the school may not involve the police, particularly where an incident can be defined as experimental. However, if there are abusive and/or aggravating factors, incidents may need to be. Regardless of this, in **all** instances staff should:

- Immediately log a concern and raise this with the DSL
- DSL will then do the following:
 - Hold initial review meeting
 - Interview children involved
 - Parents / carers informed at early stage
 - Decision made on action to be taken
 - Parents kept informed during process
 - Follow up support offered

20. Online Safety and Keeping Safe

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; and, sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school to protect and educate the whole school and community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views, misogyny, self-harm and discriminatory views
- **Contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying, non-consensual sharing of nudes or semi-nudes and / or pornography.
- **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

If staff feel any student is at risk of any of the above or might have / had exposure to. Then this should be reported as a safeguarding concern. These four areas form the basis for our online safety curriculum across the school, which is overseen by the IT facilitator and the DSL working in conjunction. Children are also taught about keeping themselves safe through our PSHE / RSE / LifeSkills programmes as well as bespoke lessons on online safety built into the computing curriculum.

20.1 Online Safety Policy

In March 2023, the DfE published Filtering and monitoring standards for schools and colleges. NCBIS has appropriate filtering and monitoring systems in place to protect children from illegal, inappropriate or harmful online content.

The online safety policy works in conjunction with the safeguarding and child protection policy as this reflects the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks. Schools are directly responsible for ensuring they have an appropriate level of security protection in place, in order to safeguard their systems, students and staff. This will be reviewed annually alongside the Safeguarding policy. Restrictions in NCBIS are put in place on the school network and on mobile phone usage (see Mobile Phone Usage Policy) to ensure students, staff and network is safeguarded against these potential dangers.

Photos of pupils are considered personal data. For the use of pupil photos for NCBIS media, the school obtains explicit consent from parents through bi-annual canvassing. Records are amended, and parents maintain the right to withdraw their consent at any time.

21. Recruitment of staff

Safer recruitment in international schools is more challenging than in the UK due to the complexities of verifying background checks and references across multiple countries, differing safeguarding standards, and the lack of centralised systems like the UK's DBSs. For this reason, NCBIS employs additional layers of diligence to protect students and staff in recruiting suitable candidates.

21.1 Pre-employment checks and procedures

The NCBIS Safer Recruitment Policy is committed to safeguarding and promoting the welfare of children. To ensure child safety, NCBIS recruits according to the following procedures:

- In Egypt, the Department of Social Solidarity with the Department of State Security complete extensive criminal reference checks on non-Egyptian nationals before issuing a work visa. Egyptian nationals must undergo a police check before a job offer becomes binding.
- In addition to this, applicants who are either UK residents or applicants, undergo appropriate child protection screening, which includes checks with past employers. The appropriate national equivalent is demanded for other nationalities.
- According to advice from KCSiE 2024, it is recommended that new recruits undergo a full online search prior to selection. This is conducted by Avaanz consultancy in London, UK.
- Applicants will be required to submit an original birth certificate
- No applicant is allowed to begin work with NCBIS students until the successful completion of the appropriate safety checks.

The following further checks are also sought:

- Degree/post graduate certificates are confirmed through the authorities by the HR Department. Original copies are to be given to the HR Department before arrival in Egypt.
- A medical certificate is sought to ensure that the member of staff is fit for the post on offer. An additional safeguard exists via the expatriate and local medical insurance, which is provided for all NCBIS employees.
- References from the present employer (head/principal) and any previous recent employer are required.

- One of the questions on the reference form is whether there is any reason why the candidate cannot work with children/ does the staff member have a criminal record? **In all cases, the appointee's main references are followed up personally by phone call.**
- As an additional measure, the domain name of the email address (e.g. @gmail.com) from the main reference is reviewed to ensure that the email address is from a legitimate organisation.
- Barred list checks and prohibition checks
- Section 128 Checks for Senior Leadership / Management roles.
- Full ACRO ICPC checks for any appointee that has lived and worked in the UK.
- Police checks, together with references and interview information should be reviewed.

All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks. Please see our safer recruitment policy for further information and guidance.

22. Harm Tests and Allegations Against Staff

In simple terms, a person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. In other words it is something a person may do to cause harm or pose a risk of harm to a child (a person aged under 18 years). This could include:

- 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 / 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. For example, an incident outside of school which did not involve children but could have an impact on their suitability to work with children (e.g. an incident of domestic abuse).

If any member of NCBIS staff is concerned about the actions or behaviour of a member of staff and what that behaviour indicates about their suitability to work with children, should be reported through the normal 'Raising Concerns' procedure, namely to the DSL or Principal.

22.1 Low Level Concerns about Staff

The term 'low-level' concern does not mean that it is insignificant, it means that a behaviour towards a child does not meet the threshold. Unlike 'abusive' behaviours which would warrant allegations against staff through the 'Raising Concerns' procedure. Low level concerns include in their spectrum of behaviour the following:

- Inadvertent or thoughtless behaviour
- Behaviour that may appear appropriate, but not be in other circumstances
- Behaviour which could enable abuse (e.g. lead to grooming)

- Behaving in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. For example:
 - Being over friendly with children
 - Having favourites
 - Taking photographs of children on their mobile phone
 - Engaging with a child in on a one-to-one basis in a secluded area
 - Inappropriate sexualised, intimidating or offensive language

In all cases low-level concerns should be reported to the Principal, who may ask the DSL to further monitor and investigate. The process should involve addressing the behaviour with the member of staff, identifying any ongoing patterns or further incidents and then acting upon this if the concerns persist, as per the 'Raising Concerns' policy. All staff should be aware of the above and ensure they have read supporting policies (such as Code of Conduct) to ensure there are protections in place against false accusations and misunderstandings.

23. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and board members in the school. Our policy and procedures also apply to extended school and off-site activities

23.1. The Role of the Designated Safeguarding Lead (DSL)

The governing board should ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Our DSL is Sam Hurst. The DSL takes lead responsibility for child protection and wider safeguarding including online safety. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Outside of school hours, the DSL can also be contacted if necessary by email and phone. When the DSL is absent, the deputy DSL will act as cover. This is Catherine Paradine.

If the DSL and Deputy DSLs are not available, the Principal will act as cover (for example, during out- of-hours/out-of-term activities).

- The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body and support staff who make such referrals directly.
- The DSL will also keep the principal informed of any issues.
- The DSL will inform the Safeguarding link on the Board of Directors. Any legal requirements, the DSL will consult in confidence with the Chairman of the Board.
- The full responsibilities of the DSL are set out in their job description.

23.2 DSL responsibility towards the transfer of Child protection files

Where children leave the school the DSL should ensure their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as DSLs and SENCOs, are aware as required. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

23.3 Deputy Designated Safeguarding Leads (DSL)

At NCBIS we choose to have one leading deputy DSL who supports the DSL based in the primary section. The Deputy is trained to Advanced Child Protection Level 3 and their role is explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

23.4. All Staff

All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education and review this guidance at least annually, with refresher training sessions done for staff during the year. This will be recorded on the online electronic CPOMS platform and available for DSLs to view.

All staff will be aware of:

- Our systems which support safeguarding, the role of the designated safeguarding lead (DSL) the whistle blowing policy and the behaviour policy

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation

Appendix 4 of this policy outlines in more detail how staff are supported to do this.

23.5. The Governing Board

The governing board will approve this policy at each annual review, and hold the Principal to account for its implementation. The governing board will appoint a board member safeguarding lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The chair of the board will act as the 'case manager' in the event that an allegation of abuse is made against the principal, where appropriate.

23.6 The Principal

The principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Ensuring the relevant staffing ratios are met, where applicable

23.7 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, this is reported to the DSL and the Principal. If you have concerns about the Principal, report to the designated member of the board responsible for Safeguarding (failing this the DSL).

24. Notifying Parents about disclosures

The DSL makes the decisions about as, when, and if parents should be notified in the event of a suspicion or disclosure. The welfare of the student will always be at the heart of this decision and timeline. No other staff will talk to parents about any such concerns without consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will

consider alternative action before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved unless there is a specific risk presented in doing so.

25. Mobile Phones and Cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils, aside from doing registers. The only exception to this is the Senior Leadership Team who may need to use their phones in the case of an emergency. Staff will not take pictures or recordings of pupils on their personal phones or cameras. Photos and / or videos should only be taken on school devices and uploaded to a shared drive then deleted from that device. Photos / videos should be used for in-school purposes. The only person(s) allowed to post externally is the Marketing manager or Leadership Team. For further details on staff use of social media, please refer to the Acceptable Use Policy. We advise all staff not to have social media 'friendships' with any current student(s) on any social media platform. Communications should be made through formal channels such as email.

26. Record-keeping & training and support

We will hold records until the child's 26th birthday. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, will be recorded in writing if they were raised prior to September 2019 or electronically on the CPOMS platform if raised after this date. If you are in any doubt about whether to record something, discuss it with the DSL. All records are confidential and shared on a *need to know* basis at the discretion of the DSL.

27. All Staff - Ongoing training

At induction, all staff will have made available to them this safeguarding policy; the raising concerns policy; online safety policy; acceptable use policy; behavior policy; staff code of conduct; children missing education policy. They will be informed of who the DSL is and the DSL role within the school and will be provided with and asked to read Part 1 and Annex A of Keeping Children Safe In Education 2024.

- Every year, all staff should be made aware of the school's policy and procedures regarding child protection. Have regular, mandatory child protection training.
- All staff will undertake annual safeguarding training.
- The Designated Safeguarding Lead and deputies will undergo training in safeguarding children not less than every two years.
- The Principal will undergo advanced child protection training in not less than every 2 years.

- Temporary and voluntary staff who work with children are to be made aware of the arrangements in this guidance.

All staff members will undertake annual safeguarding and child protection training to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. Staff will complete annual Safeguarding training using the CPOMS platform and are also asked to complete online safety and Prevent training. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually. Volunteers will also be asked to complete annual training.

28. DSL Training Log

DSL	August 2024	Exp. August 2026
DDSL	August 2024	Exp. August 2026

29. Board Members

All board members complete online safeguarding training annually to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. The designated safeguarding board member will complete additional "governor safeguard training" once appointed.

30. Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the UK's Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

Appendix 1: Types of abuse (KCSIE 2024)

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. **In most cases, multiple issues will overlap with one another.**

Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who maybe need help or protection. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

If staff are unsure, they should always speak to the designated safeguarding lead (or the deputy).

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. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

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.

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. 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. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

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 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.

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

All staff at NCBIS have been advised that if there are any concerns, however small they may appear, they must report these immediately.

Appendix 2: Keeping Records and Making a Report

Concerns should be recorded online on the “CPOMS” platform. As soon as a concern is raised – DSL will be immediately informed. When the DSL has read the concern, a commensurate action will be added if appropriate. You will not normally be notified of the outcome.

In the event that the online platform cannot be reached, there are two options. **Option 1** is email the form below to the DSL immediately. **Option 2** is to complete the form below and hand this in an envelope for urgent attention of the named DSL.

Child's Name :			
Child's DOB :			
Male/Female :	Ethnic Origin :	Disability Y/N :	Religion :
Date and time of concern :			
Your account of the concern : (what was said, observed, reported and by whom)			
Additional information : (your opinion, context of concern/disclosure)			
Your response : (what did you do/say following the concern)			
Your name :		Your signature :	
Your position in school :		Date and time of this recording :	
Action and response of DSL:			
Feedback given to member of staff reporting concern:		Outcome of action taken by DSP/Headteacher (e.g. what was parental response? outcome of professional consultation/referral? etc.)	

<p>Information shared with any other staff? If so, what? Information was shared and what was the rationale for this?</p>	
<p>Name:</p>	<p>Date:.....</p>

Checklist

- Child clearly identified?
- Name, designation and signature of the person completing the record populated?
- Date and time of any incidents or when a concern was observed?
- Date and time of written record?
- Distinguish between fact, opinion and hearsay
- Concern described in sufficient detail, i.e. no further clarification necessary?
- Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
- Record free of jargon?
- Written in a professional manner without stereotyping or discrimination?
- Record of concern passed to DSL in a timely manner?
- The record includes an attached completed body map (if relevant) to show any visible injuries

Appendix 3: Guideline Checklist for Disclosure Follow-up:

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL or record on the online platform.

Determine risk for re-offence

- What? / Who? / When? / Where?

If the offence is ongoing and the child lives with the offender

- Will you report to authorities?
- Who will you bring in to protect the child, such as a non-offending parent?
- What immediate actions can the child take apart from reporting?

Listen to as much as the child wants to tell you without pushing the child for details. Try to keep limits – giving the child other alternatives to talk if more time is needed, such as counseling or others in her/his support system.

Explore the feelings and concerns the child has about the experience

- Guilt
- Fear
- Shame
- Anger

Affirm that the experience was “assault” and thus s/he is never to blame for someone else's action. Affirm each of the feelings, while also determining if those feelings are overwhelming to the child, then working on helping the child put those feelings within a healthy limit.

Explore the support system so the child can have someone to talk with

- Parents or other adult relative?
- Friend?
- Trusted adult such as a teacher, School Counsellor

External support:

- Maadi Psychology Centre - 16 Oraby, Maadi as Sarayat Al Gharbeyah, Al Maadi, Cairo Governorate 11431 Tel: 02 23592278
- The Behman Hospital Helwan (24h Emergency Support) - 32 El-Marsad St, Helwan Sharkeya, Qism Helwan, Cairo Governorate. Tel: 02 28166610

Explore the play the child enjoys and help her/him continue to do these things

- Movies with friends
- Parties that are safe
- Arts, writing

End the session by making sure the child knows what to do if attempted or assault happens again.

- Say NO, or run away to somewhere safe – ask the child to specify to whom
- Tell someone – ask the child to specify to whom
- Consider giving child an emergency number

Appendix 4: NCBIS Procedural Guidelines in the event of a disclosure or clear indications that a child has been abused

In recent years, Egypt has made progress in the protection of children, reforming legislation and providing services for the most vulnerable children. However, important challenges remain, particularly with regards to resource allocation. Bearing in mind that resources are stretched and awareness of child protection legislation within Egypt by our students may be limited, it is likely that our students will turn to us as trusted adults.

Trusted Adults

All adults working regularly in the School are considered appropriate for that position. All visitors to the school should wear a red lanyard "Visitor" badge. The adults who work directly with children are trusted adults for the children and they may share any concerns or worries with these adults. The "trusted adults" should act appropriately in the company of children and not place themselves in situations that may be misunderstood. To this end, the School operates safe recruitment procedures.

Action by trusted adult

Notification of abuse or neglect is required when "a person suspects on reasonable grounds that a child has been or is being abused or neglected". A student may tell you directly and specifically what is going on, or s/he may hint indirectly at a situation. Sometimes the child will use "strings attached," such as asking the teacher to promise not to tell anyone (a promise the teacher cannot keep). Or, a student may claim the problem belongs to someone else, that s/he is only there about a friend. Use your judgment in deciding how much to discuss the situation with the child.

If a child makes a disclosure to you as a trusted adult, you should:

- Be welcoming, even if the time isn't convenient. It may have taken a great deal of courage for them to approach you as an adult and they may not do so again.
- Find a quiet place where the conversation won't be interrupted.
- Stay calm and listen very carefully. Trust your "gut" feelings.
- Allow the child to talk at its own pace.
- Ask questions for clarification only. Talk quietly with the child without leading them. The child's sense of trust in the adult(s) is paramount in these situations therefore it is important to reassure the child that you believe their story.
- Reassure them. Tell them you are sorry that this has happened to them and that you will do all you can to help them.
- Explain what may happen next.
- Make notes as soon as possible afterwards including date, time, place and exact words used. All reported concerns should be recorded by hand. Observations should be clearly outlined and substantiated. Sketches should be included as appropriate. (See Appendix 2 for Child Protection Report Form)

- Make the child aware that you cannot keep the information to yourself and will seek help from other appropriate adults.
- Inform the Designated Safeguarding Lead immediately. Give the original notes to the relevant Designated Safeguarding Lead as soon as possible
- Respect the child's privacy by not discussing the situation out of school.
- Under no circumstances contact the parents at this stage or investigate/verify the situation. The decision about when and how to contact parents lies with the DSL.
- After reporting it is important to maintain a supportive presence for the child.

Anyone aware of a disclosure by a child must report it to the appropriate school's Designated Safeguarding Lead. Remember that an educator who reports in good faith is protected from civil liability.

Action by Designated Safeguarding Lead:

Following the disclosure, the relevant Designated Safeguarding Lead will:

- Mark the disclosure as 'read' on CPOMS.
- This information is confidential and the Child Protection files remain locked in a filing cabinet (if historical) or kept confidentially online encrypted using CPOMS. The DSL has an authenticator app that authorises higher-level access.
- Information will only be shared on a 'need to know basis.'
- The Designated Safeguarding Lead and Principal will decide what further action is required within 24 hours of the report.
- Ensure the physical and emotional safety of the child – if the child faces danger by returning to the family, an alternative living arrangement should be sought where possible. It may also be important to avoid the risk of an abuser being alerted prematurely before the child is adequately protected.
- Arrange a meeting with parents and school counsellor, as soon as possible but no later than 96 hours of the abuse being disclosed. **Same day action will occur for the most serious disclosures.**
- In the event of serious injury to a child, the child should be taken, preferably with parents or parental consent to the appropriate medical facility.
- If any recommendation is not followed to the satisfaction of the safeguarding team, the school and the family, the case will be reviewed to see whether the child is fit to return to an academic environment and whether governmental authorities should be notified.

(See Appendix 3 for Guideline checklist for disclosure follow-up)

Appendix 5: Allegations against a member of staff, volunteer or the Principal

If the suspected offender is a teacher/ employee / volunteer the following procedures should be followed:

Stage 1

- The suspected abuse is reported to Designated Safeguarding Lead (unless the Designated Safeguarding Lead is the object of the allegation in which case the suspected abuse is reported directly to the Principal) and the Principal.
- The child's parents are informed immediately.
- Restrictions are placed on the teacher's access to the child, and possibly to all children.
- Low-level concerns are reported on the StaffSafe suite (a part of CPOMS).

Stage 2

- The Principal sees the teacher concerned, with a witness.
- The teacher is isolated from the school, with no access allowed to the school, pending investigation.
- The Principal meets with the teacher, outside the school, if necessary, for further discussion.
- Appropriate Disciplinary procedures may be invoked.
- In light of evidence, the Principal decides the appropriate course of action.

If the suspected offender is the Principal, the following procedures should be followed:

Stage 1

- The suspected abuse is reported directly to the Chairman of the Board of Directors without informing the Principal.
- The child's parents are informed immediately.
- Restrictions are placed on the Principal's access to the child, and possibly to all children.

Stage 2

- The Chairman sees the Principal with a witness.
- The Principal is isolated from the school, with no access allowed to the school, pending investigation.
- The Chairman meets with the Principal, outside the school, if necessary, for further discussion.
- Appropriate disciplinary procedures may be invoked from the staff disciplinary policy.
- In light of evidence, the Chairman decides the appropriate course of action.

The School shall not hold responsible or fault any school employee making a report of abuse that is later judged to be false, unless it can be demonstrated that the person willfully and intentionally falsified a report.

The School shall cover all legal fees for any staff named in legal action as a consequence of their having made a report of alleged child abuse in good faith.

If any member of the school community has a concern they must act immediately, informing the DSL of the concern using the online concern creation using the CPOMS platform, specifically the StaffSafe suite.. The DSL will notify the person when the concern is read and will take action to decide on the action needed, including pastoral support as appropriate. If there is a concern that a child is at risk the DSL will take the decision to inform the police, if a crime has been committed, within 24 hours. No parental consent is needed for this.

Appendix 6 Signs of FGM

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- The above indicators and risk factors are not intended to be exhaustive.

Appendix 7: Process For Raising Safeguarding Concerns:

1. Concern is put online using CPOMS
2. This sends notification to DSL and kept confidentially in online chronology
3. DSL assigns the student concern to appropriate staff and makes a decision about next steps. For low level concerns, this could be class teachers, tutors, phase leaders and heads of house.
4. If decision to inform parents is made: Contact parents as soon as possible
5. If a decision to monitor / support is made: inform relevant staff (including teacher / tutor) to monitor and feedback regularly employing relevant support systems in school to ensure full support for those affected.
6. After monitoring and discussion with parents, the DSL will continue to monitor and refer back to parents where needed. Decisions may be made to refer to external authorities.
7. DSL informs the Principal if referring to external agencies.

Appendix 8: Process for students to raise concerns to the safeguarding team

1. The landing page on each child's laptop during school hours will have a [Google Form](#) entitled 'are you concerned about anything?'. This is the main student portal for submitting concerns about themselves or a peer.

Appendix 9: Child-on-child abuse guidelines

What is child-on-child abuse?

- **Bullying:** if a child is suffering or at risk of significant harm, a bullying incident should be addressed using the Anti Bullying procedures set out in the linked policy. Bullying can take different forms, including cyberbullying, racist and religious bullying and homophobic bullying. It's important to bear in mind that some types of behaviour or communication may constitute a criminal offence
- **Domestic violence:** teenage relationship abuse involves controlling, coercive, threatening behaviour, violence or abuse between intimate partners or family members aged 16 or over. It can be psychological, physical, sexual, financial and/or emotional
- **Child sexual exploitation (CSE):** defined as an individual or group taking advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. CSE:
 - Can be perpetrated by other children
 - May have occurred even if the sexual activity appears consensual; for example, if the child is legally old enough to consent but lacks the freedom or capacity to do so. This applies if the child is fearful or under the influence of harmful substances
 - Does not always involve physical contact – it may occur through use of technology
 - Can sometimes be mistaken for ‘normal adolescent behaviours’
 - Is never the victim’s fault, even if there is some form of exchange
- **Harmful sexual behaviour:** involves a child engaging in discussions or acts that are inappropriate for their age or stage of development, whether online or offline. It includes sexualised language or role play, viewing pornography, sexual harassment and sexual violence (see below). It also includes ‘sexting’, whereby a sexually explicit text, image or video is sent or received. Note: it is a criminal offence to possess or distribute sexual content in Egypt.
 - **Sexual harassment:** unwanted conduct of a sexual nature, which can include:
 - Sexual comments
 - Sexual “jokes” or taunting
 - Physical behaviour
 - Online sexual harassment
 - Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence
- **Sexual violence:** rape, assault by penetration or sexual assault, as defined by the Sexual Offences Act 2003. Note: the age of consent is 16, and a child under 13 can never consent to sexual activity

- **Serious youth violence:** this form of abuse applies to victims aged 1-19 who are subject to offences such as violence, sexual offences, robbery, or gun or knife crime. This may occur within the context of gang activity

What to look for

Peer-on-peer abuse is a complex issue and will have varied warning signs. Knowing what to look for is vital to early identification of peer-on-peer abuse and preventing it from escalating. However, staff should be alert to:

- Changes in behaviour or demeanour; for example, a child becoming withdrawn
- Signs of depression or anxiety
- Avoidance of particular individuals
- Unexplained injuries
- Unusually poor performance at school
- Sudden development of sexualised behaviour or language
- Exclusion or isolation from peers
- Acts of servitude

The above are explained in part 1 of Keeping Children Safe in Education, the Department for Education's (DfE's) statutory safeguarding guidance.

Vulnerable children

While peer-on-peer abuse can affect all children, research shows that some are particularly vulnerable:

- Young people aged 10 or over
- Girls and young women, with boys and young men more likely to be identified as abusers
- Boys and young men in gang-affected neighbourhoods
- Those with a history of abuse within their families
- Young people in care
- Those who have experienced loss through bereavement
- Children with special educational needs and disabilities

What to do

- Staff should be aware that safeguarding issues can manifest via peer-on-peer abuse and should know the school's policy and procedures with regards to this issue.
- Staff should speak to one of the DSL if they are concerned that a child is experiencing, or at risk of, peer-on-peer abuse.
- Where staff share concerns, DSLs should coordinate a plan of action and trigger safeguarding procedures.
- Upon receiving an allegation Senior Leaders and the DSL should consider the school environment and the implications where victims and perpetrators attend the same

classes. For example, the DfE says that in the case of a report of sexual violence or sexual harassment, a school should consider the proximity of the victim and alleged perpetrator immediately; if rape or assault by penetration is reported, the alleged perpetrator should be removed from any classes they share with the victim.

- The wishes of the victim should be considered in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment
- Review the support in place for both victims and perpetrators, including how you protect anonymity where appropriate. Perpetrators may need help to understand the implications of their behaviour
- Consider the wider context of both the victim and perpetrator to build a picture of why the abuse may be occurring
- Ensure pupils are taught about what constitutes acceptable behaviour and learn about topics such as healthy and respectful relationships, self-esteem and gender roles. Ensure that they understand the consequences of peer-on-peer abuse, and address any culture of abuse, of any form, that may develop

Challenge inappropriate behaviours

As part of enforcing these policies and measures, staff should challenge inappropriate behaviours by, for example:

- Making clear that sexual violence and sexual harassment is not accepted, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as ‘banter’, ‘part of growing up’, ‘just having a laugh’ or ‘boys being boys’

Dismissing inappropriate behaviours risks normalising them. Clear sanctions in line with the behaviour policy should be given in order to respond effectively to incidents.

Providing a preventative curriculum programme

In order to address issues associated with child-on-child abuse the LifeSkills curriculum should ensure that children are taught about safeguarding, including how to stay safe online and also tackles issues such as:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Consent
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- Sexual violence and sexual harassment

These issues are addressed in an age-appropriate and inclusive way, and are explored through our computing, PSHE and LifeSkills curriculum at NCBIS.

Child on child sexual abuse

Immediate response to a report

- All staff are trained to manage a safeguarding report.
- If the member of staff who takes the disclosure is not the designated safeguarding lead (DSL), or a deputy DSL, they should be informed as soon as possible. The DSL (or a deputy) will take the lead, supported by other leaders as required.

To help you shape the response to a report, the DSL will do 2 things in parallel:

- Conduct a risk and needs assessment
- Determine how to manage and/or escalate the report

Conducting a risk and needs assessment

Where there's been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment, considering:

- The victim, especially their protection and support
- The alleged perpetrator
- All other children at the school (and adult students and staff, if appropriate), especially any actions that are appropriate to protect them

Where there's been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The DSL will record these risk assessments and keep them under review.

Determine how to manage and/or escalate the report

The DSL will decide how to manage the report, including when to inform the alleged perpetrator. This depends on a number of important considerations, which are outlined in paragraph 251 of KCSIE. These include:

- The wishes of the victim and how they want to proceed
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- The ages and developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- Whether the alleged incident is a one-off or part of a sustained pattern of abuse

There are likely scenarios for the next steps:

1. Manage internally, where this is considered appropriate in the circumstances, and early help or statutory interventions aren't required
2. Early help, as outlined in chapter 1 of Working Together to Safeguard Children, where statutory interventions aren't required
3. Reporting to the police, where a report of rape, assault by penetration or sexual assault is made

There should be immediate consideration for safeguarding the victim, alleged perpetrator and all other children.

Ongoing response to dealing with a report:

The victim:

When supporting the victim take into consideration:

- The age and developmental stage of the victim, the nature of the allegations and the potential risk of further abuse
- The needs and wishes of the victim

You should also be aware that victims may not disclose the whole picture immediately, so dialogue should be kept open and encouraged.

Further guidance on how to support the victim can be found in paragraphs 255 to 261 of KCSIE.

The alleged perpetrator:

It can be difficult to balance the need to safeguard the victim (and other children) with providing the alleged perpetrator with an education and safeguarding support and implementing disciplinary sanctions.

When supporting (and sanctions) on a case-by-case basis, consider the following:

- The age and developmental stage of the alleged perpetrator
- The nature of the allegations and risk of harm to other children
- Any unmet needs that the alleged perpetrator may have