

# CHILD PROTECTION & SAFER RECRUITMENT POLICY

This Child Protection & Safer Recruitment Policy follows the guidance produced by:

- The United Nations Convention on the Rights of the Child,
- [The International Task Force on Child Protection](#),
- The French Ministry of National Education regulations, and more particularly:
  - *L'article 434-3 du Code Pénal*,
  - *Conduites à tenir en cas d'infraction en milieu scolaire, Memento*,
  - *Prévention et traitement des violences sexuelles*.

## 1. POLICY STATEMENT

Safeguarding and promoting the welfare of children can be defined as:

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

The staff at École Jeannine Manuel ("the School") fully recognizes their professional responsibilities for protection from harm to all children in its care. This policy applies to all **staff, volunteers and everyone working in the School** as:

- Children have a right to be safe,
- Adults have a responsibility to safeguard and protect children,
- Abuse is damaging, and can blight the remainder of the child's life,
- Abused children sometimes become abusing adults,
- Child abuse exists in a world of secrecy and silence - the cycle of abuse has to be broken,
- An abuser may well abuse many other children who also have a right to protection,
- Children should be able to grow up to be well-adjusted adults.

## 2. SCHOOL AIMS

- To establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- To ensure that children know there are adults in the School whom they can approach if they are worried.
- To raise awareness of child protection issues and equip children with the skills needed to keep them safe.
- To ensure that we practice safe recruitment, in accordance with the French Labor Law, when checking the suitability of staff, teaching, administrative, and volunteers who work with children.
- To develop and then implement procedures for identifying and reporting cases, or suspected cases, of abuse.
- To support students who have been abused, in accordance with the agreed child protection plan.

### 3. PROCEDURES

We will follow the procedures set out by the French Ministry of Education and the French Ministry of Justice, and take into account guidance issued by the CRIP<sup>1</sup> to establish:

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

### 4. DUTY OF CARE

- Ensure that the School Governors take responsibility for overseeing the Child Protection Policies and Procedures and that those are reviewed annually. The named governor with responsibility is Bernard Manuel, chairman of the board.
- Ensure that we have a designated senior person for child protection who has received appropriate training and support for this role. The named Child Protection Officer (CPO) is the Head of School.
- The deputy CPO is the nurse.
- Ensure that every member of staff (including temporary and supply staff and volunteers) knows the name of the designated senior person responsible for child protection and their role.
- Ensure that all staff and volunteers understand their responsibilities in being alert to the signs of abuse and in referring any concerns to the designated senior person responsible for child protection.
- Ensure that parents have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations in the School prospectus.
- Notify social services if there is an unexplained absence of more than two days of a student who is on the child protection register.
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- Keep written records of concerns about children, even where there is no need to refer the matter immediately. (See **appendix 3** for pastoral concern sheet)
- Ensure that all records are kept securely, separate from the main student file, and in locked locations.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer.
- Ensure that safe recruitment practices are always followed.
- Ensure that mechanisms are in place to assist staff to carry out their duties.
  
- All staff members should be aware of systems within their School which support safeguarding and these should be explained to them as part of staff induction. This should include:
  - The child protection policy; <sup>[1]</sup><sub>SEP</sub>
  - The staff code of conduct (re. Staff Handbook). <sup>[1]</sup><sub>SEP</sub>

All staff members will also receive appropriate and updated information on safeguarding and child protection procedures, at least once a year.

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<sup>1</sup> Centre de Recueil et de traitement des Informations Préoccupantes, loi n° 2007-293 du 5 mars 2007

## 5. DUTY OF THE SCHOOL

### 5.1. To appoint a Child-Protection Officer to take responsibility for:

- Implementing the child protection policy within the School,
- Supporting other staff in their understanding of child protection issues and ability to recognize the signs and symptoms of abuse,
- Managing the School's response to a disclosure of abuse.

### 5.2. To provide induction and training:

Every new member of staff, including part-timers, temporary, visiting and contract staff working in School, receives basic training on their responsibilities in being alert to the signs of abuse and bullying and on the procedures for recording and referring any concerns to the CPO or his/her deputy as well as working with different agencies. All staff are given guidelines on what to do if a child approaches them to discuss allegations of abuse (**appendix 1**) and the Code of Conduct - for All Staff and Volunteers (**appendix 2**). All are also made aware of the pastoral care concern sheet (**appendix 3**) and "Enfants en danger : comment les repérer ? Que faire?"<sup>2</sup>.

### 5.3. To support children:

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

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

- The content of the curriculum,
- The School ethos, which promotes a positive, supportive and secure environment and gives students a sense of being valued,
- The School Behavior and Anti-bullying policies, which are aimed at supporting vulnerable students in the School. The School will ensure that the student knows that some behavior is unacceptable but they are valued and not to be blamed for any abuse which has occurred,
- Liaisons with other agencies that support the student such as social services, education welfare service and educational psychology service,
- Ensuring that, where a student on the child protection register leaves, their information is transferred to the new School immediately and that the child's social worker is informed if applicable,
- Ensure that the School has considered how to teach students about safeguarding, including e-safety, and how to build resilience to the risks of radicalization. The application of adequate IT filtering and monitoring systems to safeguard children from potentially harmful and inappropriate online material when accessing the Internet at School.
- Procedures adopted to ensure that visiting speakers are suitable (whether invited by staff or students),

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<sup>2</sup> <http://eduscol.education.fr/cid50661/enfants-en-danger-comment-les-reperer-que-faire.html>

## 6. DUTY OF STAFF

It shall be made clear to staff applying for positions within the School that the School strictly follows the recommendations of the International Task Force on Child Protection.

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

Staff who observe injuries that appear to be non-accidental, or who are told anything significant by a student, must report their concerns to the CPO. The CPO has attended a course and received training on Child Protection, which included training in child protection matters. Training is updated regularly for the CPO and his/her deputy every other year.

## 7. RESPONSIBILITIES OF THE CPO

### 7.1. Referrals

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the School when deciding whether to make a referral by liaising with relevant agencies.
- Liaise with Head (where role is not carried out by the Head) to inform him/her of any issues and on-going investigations and ensure there is always cover for this role.
- Liaise with the local child-protection agencies to ensure awareness of local procedures, local referral procedures and training opportunities, and maintain a list of local contacts.

### 7.2. Raising Awareness

- Ensure the School's child protection policy is updated and reviewed annually and work with the governing body/proprietor regarding this.
- Ensure parents see copies of the child protection policy, which alerts them to the fact that referrals may be made and the role of the school in this to avoid later conflicts.

### 7.3. Training

- Recognize signs of abuse and when it is appropriate to make a referral.
- Ensure each member of staff has access to and understands the School's child protection policy, including new or part-time staff.
- Ensure all staff have minimal training covering child protection and are able to recognize and report any concerns immediately they arise.
- Keep detailed, accurate, and secure written records of referrals/concerns.
- Train all staff concerning the risks of radicalization and how to identify children and young people at risk. See section 10.5.

## 8. DUTY OF PARENTS

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

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

## 9. DUTY OF THE SCHOOL TO PARENTS

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

Every staff member is required to disclose their *casier judiciaire* (*police record*). Guidelines on the procedures to follow if an allegation is made about a member of staff will be made available to a parent if they make an allegation against a member of staff. Parents will be informed of the procedure if they make a formal complaint about a staff member or volunteer.

## 10. DEFINITIONS AND SYMPTOMS OF ABUSE

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

Abuse is a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children.

There are no absolute criteria to rely on when judging what constitutes significant harm. Overall, it can be described as the detrimental effect on a child's well-being due to various forms of child maltreatment.

- **Harm** means ill treatment or the impairment of health or development.
- **Development** means physical, intellectual, emotional, social or behavioral development.
- **Ill-treatment** includes sexual abuse and forms of ill treatment that are not physical.
- **Health** includes physical or mental health.

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

There are four main categories of abuse – **physical, neglect, sexual** and **emotional**. The list of symptoms given is not exhaustive or comprehensive but consists of frequently observed symptoms. It is important to remember that most abuse involves more than one main type, for example, sexual and emotional abuse may be recognized together. These symptoms - for example, cuts and scrapes - may also be accidental and not a sign of abuse. These different types of abuse require different approaches. A child suffering from physical abuse may be in immediate and serious danger. Action should, therefore, be taken immediately. With other forms of abuse there is a need to ensure that adequate information is gathered. There is also a need to make sure that grounds for suspicion have been adequately investigated and recorded. The need to collate information must be balanced against the need for urgent action. If there are reasonable grounds for suspicion, then a decision to monitor the situation should only be taken after discussion between the CPO and the nurse. A situation that should cause particular concern is that of a child who fails to thrive without any obvious reason. In such a situation, a medical investigation will be required to consider the causes.

### 10.1. Physical Abuse – Symptoms:

- Bruises and abrasions - especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury, especially when the child's explanation does not match the nature of injury or when it appears frequently.

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

## 10.2. Neglect – Symptoms:

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

### 10.3. Sexual Abuse – Symptoms:

- Detailed sexual knowledge inappropriate to the age of the child.
- Behavior that is excessively affectionate or sexual towards other children or adults.
- Attempts to inform by making a disclosure about the sexual abuse often begin by the initial sharing of limited information with an adult. It is also very characteristic of such children that they have an excessive preoccupation with secrecy and try to bind the adults to secrecy or confidentiality.
- Fear of medical examinations.
- Fear of being alone — this applies to friends/family/neighbors/baby-sitters, etc.
- Sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa.
- Excessive masturbation is especially worrying when it takes place in public.
- Promiscuity
- Sexual approaches or assaults - on other children or adults.
- Urinary tract infections (UTI) and sexually transmitted diseases (STD) are all cause for immediate concern in young children, or in adolescents if his/her partner cannot be identified.
- Bruising to the buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place.
- Discomfort or pain particularly in the genital or anal areas.
- Drawing of pornographic or sexually explicit images.
- Withdrawn
- Rejecting physical contact or demanding attention

### 10.4. Emotional Abuse – Symptoms:

- Crying
- Rocking
- Withdrawn
- Not wanting to socialize
- Cringing
- Picking up points through conversation with children
- Bad behavior
- Aggression
- Behavior changes
- Bribery by parent
- Self-harm
- Lack of confidence
- Attention seeking
- Isolation from peers – unable to communicate
- Clingy
- Afraid of authoritative figures
- Treating others as they have been treated <sup>[1]</sup><sub>[5P]</sub>

### 10.5. Preventing Radicalization

Protecting children from the risk of radicalization should be seen as part of Schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the

process of radicalization it is possible to intervene to prevent vulnerable people being radicalized.

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

The School shall ensure that the instructions and guidance produced<sup>3</sup> by the *Direction Générale de l'Enseignement Scolaire* (DGESCO) are thoroughly followed by all members of staff. The prevention system set up by the French "*Ministère de l'Intérieur*" is based, among others, on a national toll-free number (0 800 005 696) aimed at reporting radicalized behaviors and providing assistance to families, relatives and institutions.

The School staff member responsible for prevention is the Head of School.

### 10.6. Monitoring the Use of Online Technology

Use of technology has become a significant component of many child-protection issues: child sexual exploitation, radicalization, and sexual predation. Technology often provides the platform that facilitates harm. An effective approach to online safety empowers the School to protect and educate the whole School in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

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

- Content: being exposed to illegal, inappropriate or harmful material;
- Contact: being subjected to harmful online interaction with other users; [SEP]
- Conduct: personal online behavior that increases the likelihood of, or causes, harm

### 10.7. Additional Concerns

The School must also be aware of the following:

- Bullying, including cyber-bullying,
- Domestic violence
- Drugs,
- Fabricated or induced illness,
- Faith-based abuse,
- Forced marriage,
- Gangs and youth violence,
- Gender-based violence/violence against women and girls (VAWG),
- Mental health,

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<sup>3</sup> <http://eduscol.education.fr/cid100811/prevention-radicalisation.html>

- Private fostering,
- Sexting,
- Teenage relationship abuse,
- Trafficking,
- Missing children and adults,
- Hate-based abuse.

It is essential that children be safeguarded from potentially harmful and inappropriate online material. As such governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place.

Peer-on-peer abuse can manifest itself in many ways. Governors should ensure “sexting” and the School approach to it is reflected in the child protection policy.

### 10.8. Children with Special Educational Needs

The School acknowledges that children with special educational needs may be especially vulnerable to abuse and expect staff to take extra care to interpret correctly apparent signs of abuse and neglect. Indications of abuse will be reported as for other students. The Head shall identify students with particular communication needs and ensure that clear guidance is available for staff in relation to their responsibilities when working with children with intimate care needs.

## 11. MONITORING AND RECORD KEEPING

It is essential that accurate records be kept where there are concerns about the welfare of a child. Pastoral care concern sheets are to be filled in (**appendix 3**) and given to the CPO. These records are kept in secure, confidential files, which are separate from the child’s School records by the CPO. It is preferable, where circumstances allow, that parents be informed of and agree to any referral being made (unless it relates to sexual abuse).

Staff must keep the CPO and his/her deputy informed of:

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

When there is suspicion of significant harm to a child, and a referral is made, as much information as possible should be given about the nature of the suspicions, the child and the family. Use of previous records (if available) may prove to be particularly useful in this respect.

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

Support must be given to members of staff involved in child protection referral and, in the interest and protection of all staff, the procedure for child protection shall be under continual review in order to eliminate any bad practice. The School recognizes that staff involved in a child protection issue will find it distressing and will offer support and guidance accordingly.

Staff should be made aware that they can report any concerns directly to social services if they consider that a child protection matter is not being dealt with appropriately.

All referrals can be made directly to the national toll-free number 119. All 119 call-records are sent to the local CRIP units.

## 12. DISCLOSURE AND ACTION FOLLOWING A DISCLOSURE

Where a child discloses concerns or makes an allegation, no judgment should be made, the staff member should:

- Listen without displaying shock or disbelief
- Allow the child to talk freely
- Do not ask leading questions
- Do not promise confidentiality
- Stress that it is right to tell
- Make a written record immediately
- Explain what has to be done and who has to be told
- Pass the information to the CPO without delay

**Confidentiality should not be promised to anyone.** A record should be kept of the conversation. Where there is a suspicion that a child is suffering or likely to suffer significant harm, the concern should be referred without delay to the CPO and/or his/her deputy, who will investigate.

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

### 12.1. Action for the CPO

Following a disclosure, the CPO will then speak to the parent/s in the case of evidence of physical abuse in order to seek an explanation, but only if there is no risk to the child of further harm resulting from this action.

In the event of disclosure of suspected sexual abuse, the CPO shall make an immediate referral to the Procureur de la République and to the Directeur Académique des Services de l'Éducation Nationale (DASEN).

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

Where, following preliminary enquiries by the CPO, a prima facie case of abuse is apparent, or where there are contra-indications to preliminary enquiries, a referral should be made under local-agency arrangements. The referral should be faxed either at the time of the initial disclosure or within 48 hours of the incident to the local Social Services department office.

The referral should provide the following information if available:

- Details about their own location, status and relationship with the child.
- Whether the child is currently safe and any deadlines approaching (e.g. child about to be collected by parent; alleged abuser returning imminently to household).
- When the child was last seen and the current location of the child.
- The child's name, date of birth, sex, disability, or any known health care issues, ethnic origin, religion, language spoken.
- Any other names the child or family members have been known by.
- The address of the child and parents, and any known previous addresses.

- The family and household structure and details of any other significant people in the child's life.
- Details of the concern (if an incident, the time, place, persons involved).
- Information regarding parental knowledge or, and if appropriate, agreement to the referral.

**If the allegation concerns the Head the concern must be reported to the Chairman of the Board.**

### 13. RELATED DOCUMENTATION

- 13.1. *Conduites à tenir en cas d'infraction en milieu scolaire, Memento*  
[http://media.eduscol.education.fr/file/Action\\_sanitaire\\_et\\_sociale/27/8/memento\\_infractions\\_115278.pdf](http://media.eduscol.education.fr/file/Action_sanitaire_et_sociale/27/8/memento_infractions_115278.pdf)
- 13.2. *Prévention et traitement des violences sexuelles*  
[http://media.eduscol.education.fr/file/Action\\_sanitaire\\_et\\_sociale/52/8/guide\\_prevention\\_violences\\_sexuelles\\_144528.pdf](http://media.eduscol.education.fr/file/Action_sanitaire_et_sociale/52/8/guide_prevention_violences_sexuelles_144528.pdf)

### 14. GENERAL CONSIDERATIONS RELATING TO ALLEGATIONS AND CONCERNS OF ABUSE

The School will inform the local authorities when an allegation is made within one working day.

They will then advise the School whether or not informing the parents of the child involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, the School will inform the parents. In some circumstances, however, the parents may need to be told straight away (e.g. if a child is injured and requires medical treatment).

The School will seek advice from the local authorities and/or the police about how much information should be disclosed to the accused person.

Subject to restrictions on the information that can be shared, the School will promptly inform the accused person about the nature of the allegation, how enquiries will be conducted and possible outcome (e.g. disciplinary action, and dismissal or referral to the barring lists or regulatory body).

If the accused person is a member of staff, they should:

- Be treated fairly and honestly and helped to understand the concerns expressed and processes involved.
- Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process
- If suspended, be kept up to date about events in the workplace.

### 15. CONFIDENTIALITY

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

### 16. SUPPORT

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

As soon as possible after an allegation has been received, If the accused person is a member of staff, they should be advised to contact their union or professional association. Human resources will be consulted at the earliest opportunity in order that appropriate support can be provided via the organization's occupational health or employee welfare arrangements.

## 17. SUSPENSION

Suspension will be considered in any case where:

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

If a strategy meeting/discussion is to be held or if the local authorities or the police are to make enquiries, the School will be informed of their views on suspension. Only the School, however, has the power to suspend an accused School employee and they cannot be required to do so by a local authority or police. Teachers employed by *Éducation Nationale* remain under the authority of the *Rectorat*, which will make a decision as to whether a suspension is required.

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

## 18. SAFER RECRUITMENT

The School operates Safe Recruitment procedures and all prospective staff are subject to *casier judiciaire* checks and compliance with the International Task Force on Child Protection. All Senior Management shall attend Safer Recruitment Training every two years.

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

- Verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available
- Obtain a certificate for an enhanced *casier judiciaire* check with a barred list of information where the person will be engaging in regulated activity
- Obtain a personal write-up from the candidate, stating that s/he has never been neither labeled nor proven guilty of any misconduct of any kind towards children and that s/he commits her/himself to adopt an irreproachable behavior towards children and colleagues
- Subject to statutory restrictions, verify the candidate's mental and physical fitness to carry out their work responsibilities and ask relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
- Verify the person's right to work in the European Union (EU). If there is uncertainty about whether an individual needs permission to work in the EU, then prospective employers, or volunteer managers, should follow advice on the *Ministère du Travail* website
- If the person has lived or worked outside France, make any further checks the School considers appropriate
- Verify professional qualifications, as appropriate
- For teaching staff, check that they are not prohibited from teaching

## APPENDIX 1

### What to do if a child at the School approaches you to discuss allegations of abuse.

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

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

It is the duty of anyone who works with children at the School to report any suspicions or disclosures of abuse. This includes teachers, teaching assistants, kitchen and lunch staff, office staff, etc. It is not for the individual member of staff approached to decide whether or not a suspicion or allegation is true. All must be taken seriously and dealt with according to the policy and procedures laid down at the School.

*Article 434-3*

*Modifié par LOI n°2016-297 du 14 mars 2016 - art. 46*

*Le fait, pour quiconque ayant eu connaissance de privations, de mauvais traitements ou d'agressions ou atteintes sexuelles infligés à un mineur ou à une personne qui n'est pas en mesure de se protéger en raison de son âge, d'une maladie, d'une infirmité, d'une déficience physique ou psychique ou d'un état de grossesse, de ne pas en informer les autorités judiciaires ou administratives est puni de trois ans d'emprisonnement et de 45 000 euros d'amende.*

*Sauf lorsque la loi en dispose autrement, sont exceptées des dispositions qui précèdent les personnes astreintes au secret dans les conditions prévues par l'article 226-13.*

## APPENDIX 2

### Code of Conduct - for All Staff and Volunteers Interaction with Students: Model Code of Conduct for Staff

1. Staff and volunteers should not spend excessive amounts of time alone with children, away from others. Meetings with individual children should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff or volunteers should be aware of the meeting.
2. Staff and volunteers are advised not to make unnecessary physical contact with children. However, there may be occasions when physical contact is unavoidable, such as providing comfort at times of distress, or physical support in contact sports or similar. In all such cases contact should only take place with the consent of the child.
3. It is not good practice to take children alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardians) and the head or a member of the SMT.
4. Staff and volunteers should not start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should just record the facts and report these to the CPO or her/his deputy.
5. Staff and volunteers should never (even in fun):
  - a. Initiate or engage in sexually provocative conversations or activity.
  - b. Allow the use of inappropriate language to go unchallenged.
  - c. Do things of a personal nature for children that they can do themselves.
  - d. Allow any allegations made by a child go without being reported and addressed, or either trivialize or exaggerate child abuse issues.
  - e. **Make promises to keep any disclosure confidential from relevant authorities.**
6. Staff or volunteers should not show favoritism to any one child, nor should they issue or threaten any form of physical punishment.
7. Social networking between students and staff should only be devoted to pedagogical activities. Anyone under contract with the School needs to ensure, both for the School's safety and their own, that activity on social networks does not bring the School into disrepute, does not bring the teacher into disrepute, does not expose the school to legal liability and reflects 'safer internet' practices.
8. Staff and volunteers must respect children's rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behavior they do not like.
9. Staff and volunteers will be expected to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their role within the School.
10. All staff and volunteers should be aware of the procedures for reporting concerns or incidents, and should familiarize themselves with the contact details of the CPO or his/her deputy.
11. If a member of staff or volunteer finds himself or herself the subject of inappropriate affection or attention from a child, they should make others aware of this.
12. If a member of staff or volunteer has any concerns relating to the welfare of a child in their care, be it concerns about actions/behaviors of another staff member or volunteer or concerns based on any conversation with the child, particularly where the child makes an allegation, they should report their concerns to the CPO or his/her deputy.

## APPENDIX 3

### Pastoral Care Concern Sheet

<b>Student's Name:</b> <b>D.O.B:</b> <b>Class:</b>	
<b>Teacher:</b>	<b>Date:</b>
<b>Details of incident/concern:</b>          	
<b>Action Taken:</b>          <b>Signed: .....</b> (Name and position)  <b>Reviewed by CPO .....</b> (Sign /date)	
<b>Final Outcome/ Next steps:</b>          <b>Signed: .....</b>	

## USEFUL REFERENCES

### Key Contacts and Resources

Paris Campus	Lille Campus
ALLO 119 <a href="http://www.allo119.gouv.fr">www.allo119.gouv.fr</a> 08 service d'aide aux victimes 01 41 83 42 08	
CPO – Jérôme Giovendo – 01 44 37 00 71 Deputy CPO – Sylvie Girier – 01 44 37 01 33	CPO – Constance Devaux – 03 20 65 90 51 Deputy CPO – Amélie Lefort – 03 20 28 04 53
CRIP 01 53 46 86 81 <a href="mailto:crip75@paris.fr">crip75@paris.fr</a>	CRIP Marcq-en-Baroeul (UTPAS) 03 59 73 99 00
DASEN Paris (Téléphone) 01 44 62 40 25 (Fax) 01 44 62 40 38 <a href="mailto:ce.dasen1@ac-paris.fr">ce.dasen1@ac-paris.fr</a>	DASEN Nord 03 20 62 30 03
Rectorat de Paris Pôle Académique d'assistance judiciaire 01 44 62 41 51 Service médical 01 44 62 47 30 01 44 62 47 31 01 44 65 47 39 <a href="mailto:ce.santsoc@ac-paris.fr">ce.santsoc@ac-paris.fr</a> Service infirmier 01 44 62 35 68	Rectorat de Lille Pôle Académique d'assistance judiciaire 03 20 15 63 34 <a href="mailto:ce.sajc@ac-lille.fr">ce.sajc@ac-lille.fr</a> Service médical 03 20 15 60 84 <a href="mailto:ce.sermed@ac-lille.fr">ce.sermed@ac-lille.fr</a> Service infirmier 03 20 15 60 26 <a href="mailto:ce.serinf@ac-lille.fr">ce.serinf@ac-lille.fr</a>
Procureur de la République, TGI Paris 01 44 32 51 51	Procureur de la République, TGI Lille (Téléphone) 03 20 78 33 33 (Fax) 03 20 78 50 09

### Deficiencies and Weaknesses

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

### Complaints

All complaints arising from the operation of this policy should be referred to the CPO. The proprietor will arrange for the complaint to be investigated.