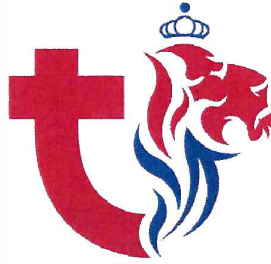


**ENGLISH
INTERNATIONAL
SCHOOL OF TUNIS**
British Curriculum



EIST SAFEGUARDING POLICY 2025-2026

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At EIST, we focus on developing the whole child, aiming to ensure that each pupil leaves here ready for the challenges of life and understanding their responsibilities towards others. We want our pupils to leave school well equipped to engage positively with a rapidly changing world as accomplished problem solvers and innovators, confident in their ability to lead and with a clear appreciation of and respect for the views and potential of others.

1. School Contacts

Designated Safeguarding Lead

Lisamarie Murphy: mlisamarie@eistunis.org

Deputy Safeguarding Lead

Hajer Baccouchi: hbaccouchi@eistunis.org

Designated Safeguarding Governor

Zied Ben Ghorbel: zbenghorbel@eistunis.org

Assistant Safeguarding

Molka Ben Tahar: mbentahar@eistunis.org

Head of Primary

Frank Warwick: fwarwick@eistunis.org

Principle

Jacqueline Johnson: jjohnson@eistunis.org

Child Psychologist

Miss Maryem Oun - omaryem@eistunis.org (English, French and Arabic speaker)

3. Policy Statement

The welfare of our pupils is the School's paramount concern. As a School we do all that we can to promote the welfare of pupils and to ensure that children are protected from harm both within the School and beyond our direct control. The School recognises that we have a duty to protect children at risk of harm and also those children who need extra help. We are committed to:

- Establishing and maintaining an ethos where children feel secure and are encouraged to talk and are always listened to.
- Ensuring that all children know there is an adult in the School whom they can approach if they are worried or in difficulty.
- Including across the curriculum, such as through the PSHE programme, opportunities which equip children with the skills they need to stay safe from harm and to ensure they know to whom they should turn for help. This will include a focus on e-safety and on promoting emotional and mental well-being and resilience in a rapidly changing world which presents new challenges, such as the risks of extremism and radicalisation.

It is the responsibility of all staff, including contractors to be fully aware of our child protection and child safeguarding policy.

The content of much of our policy has been based on the document Keeping Children Safe in Education. Whilst some parts of this document are specific to England, there is a lot of the document which would also be applicable to our setting.

[Keeping Children Safe in Education \(KCSIE\) 2025](#)

As part of the School's inductions and safeguarding training, all staff are expected to complete the Educare Safeguarding and Child Protection courses (Level 2). Our Safeguarding Leads will complete the Level 5 course. Some of our staff will complete an abridged version of the course translated by our Arabic Staff (security guards, maintenance staff, cleaners and dinner staff).

Aims of the Policy:

- To support each child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, confident in knowing how to approach adults if they are in difficulty or danger.
- To provide an environment and framework in which children and young people know they will be listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and to ensure that we contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the School which will be followed by all members of the School community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially our Child Psychologist.
- To ensure that all adults within our school who have substantial access to children have been checked as to their suitability.

4. Legal framework

English International School is a school in Tunisia bound by Tunisian law, but it takes guidance from the UK on matters of safeguarding and child welfare and wellbeing therefore this policy is influenced and guided by all relevant UK legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003

- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015) · Equality Act 2010
- Counter-Terrorism and Security Act 2015

The UK General Data Protection Regulation (UK GDPR)

Statutory guidance

- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2021) 'Keeping children safe in education 2025'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2021) 'Recruit teachers from overseas'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following school policies:

- Peer-on-Peer Abuse Policy
- Anti-Bullying Policy
- Exclusion Policy
- Online User Agreement and Safety Policy
- Personal Electronic Devices Policy
- Data Protection Policy
- Photography Policy
- Whistleblowing Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Behavioural for High Performance Learning Policy
- Wellbeing Policy

EIST will also work closely, as appropriate, with any supportive Tunisian services. Which are the Ministry for Women and Children and the Children's Social Protection Centre of Tunis.

At any stage of this process, the school may seek guidance and support from the DGPE (21671798603) [DGPE Contact Page](#) or via email at dgpe@delegue-enfance.nat.tn. The school may also contact relevant child protection helplines, including the National Child

Protection Hotline (1107), the National Telephone Line for Children (1056), Together for the Child (11525), and the Child Ombudsman Hotline (8001132000), where appropriate.

Where it is considered safe, appropriate, and in line with legal requirements, the school may also communicate safeguarding concerns with the child's parents or carers. In all instances, the child's safety, wellbeing, and best interests will remain the primary consideration.

5. Acronyms

This policy contains a number of acronyms used in the UK Education sector. These acronyms are listed below alongside their descriptions.

CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care in Tunisia
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.



DSL	Designated safeguarding lead	A member of the senior leadership team who has led responsibility for safeguarding and child protection throughout the school.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.

KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.

FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in Tunisia and a form of child abuse with long-lasting harmful consequences.
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6. Management of safeguarding – roles, responsibilities and training

The DSL is responsible for:

The Designated Safeguarding Lead (DSL) is the senior member of staff with lead responsibility for safeguarding and child protection within the school. In accordance with [Keeping Children Safe in Education \(KCSIE\) 2025](#), the DSL will take overall responsibility for safeguarding and child protection, including online safety, and will act as the main point of contact for staff, pupils, parents and external safeguarding agencies. The DSL is responsible for managing referrals to children’s social care, the police, the Channel programme and other relevant agencies where appropriate, whilst ensuring that accurate, detailed and secure safeguarding records are maintained. The DSL will support staff in recognising and responding to safeguarding concerns, provide advice and guidance, promote a strong safeguarding culture throughout the school, and ensure that safeguarding policies and procedures are implemented effectively and reviewed regularly. The DSL will also ensure that all staff receive appropriate safeguarding training and updates, work closely with multi-agency partners, monitor patterns of concern, and ensure that the voice, wishes and best interests of the child remain central to all safeguarding decisions. Deputy DSLs may support the role; however, the ultimate lead responsibility remains with the DSL.

The Psychologist is responsible for:

The school recognises that the School Psychologist plays an important role in supporting the emotional wellbeing, mental health and safeguarding of students. The School Psychologist may become aware of safeguarding concerns through direct disclosure, observations, assessments, conversations with students, parents or staff, or through ongoing pastoral support. In line with the principles of [Keeping Children Safe in Education \(KCSIE\)](#) and [Working Together to Safeguard Children](#), the School Psychologist has a duty to share safeguarding concerns promptly with the Designated Safeguarding Lead (DSL) and must not promise confidentiality where a child may be at risk of harm. The role of the School Psychologist is to support early identification, provide appropriate emotional support and contribute professional expertise to safeguarding processes, whilst always working within the school’s safeguarding procedures and multi-agency approach. Accurate, factual and timely

records of concerns, disclosures and actions taken will be maintained in accordance with school policy, data protection requirements and safeguarding guidance.



The Board of Directors are responsible for:

- The Recruitment Policy
- Ensuring that anyone involved in the recruitment process has completed the Educare Safer Recruitment course

7. Concerns about a child (including practical advice for staff)

In any school there is the possibility that pupils will show signs and symptoms of abuse or will disclose to staff that they have been abused.

The notes below are intended to provide practical advice to staff on how to handle disclosures and to provide guidelines for dealing with such disclosures that must be followed by all employees of EIST. In line with our statutory obligations the interests of the child must be paramount, though the School will also wish to take account of the interests of other pupils, staff and parents. It is also crucial for staff to be aware of the different levels of risk and need presented by pupils.

It is the responsibility of all staff to act on any suspicion, concern or disclosure that suggests a child is in need of support services or is at risk of significant harm.

Please refer any concerns to the DSL, who will take appropriate action. If the suspicion, concern or disclosure involves an allegation against anyone working at the school, please pass on to the DSL or the Principal in confidence.

The School will work according to the guidance and procedures of Tunisia and with a range of agencies including the police, health and other services to promote the welfare of our pupils and protect them from harm. This is all organised via the psychologist.

Although the School will usually consult parents/guardians and the pupil in taking the decision to seek additional, external agency support for that pupil, consent is not required if the School has grounds to believe the pupil to be at risk of harm.

Abuse entails the maltreatment of a child. Somebody may abuse 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 four recognised forms of abuse:

Physical Abuse

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

Emotional Abuse

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

Sexual Abuse

For the purposes of this policy, "**sexual violence**" refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos. · Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

Neglect

Neglect can be defined as 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); failing to protect a child from physical and emotional harm or danger; failing to ensure adequate supervision (including the use of inadequate care-givers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. Failing to send children to school or providing them with appropriate food, sufficient sleep etc is a form of neglect.

8. Symptoms of Abuse

Many of the following symptoms may occur for reasons other than abuse and, inevitably, some pupils who have been abused will not display any of these symptoms. The distinctions between the different aspects of abuse are manifestly not rigid, but they should be useful as a guide.

Neglect or Emotional Abuse

The pupil:

- May look particularly thin or unwell
- Complains of hunger, lacking energy
- Has repeated accidents, especially burns
- Is left alone at home inappropriately
- Is repeatedly unwashed, smelly
- Is kept away from school medicals
- Is reluctant to go home, especially at weekends
- Is unusually 'hard' or 'detached' when told off
- Is unable to make normal friendships

Physical Abuse

The pupil has:

- Injuries that are not adequately explained by the pupil
- Current bruising/injury with a long history of bruises and accidents
- Injuries getting progressively worse or occurring in a time pattern (e.g. every Monday morning)
- Grip marks on arms or slap marks (cheeks, arms, legs)
- Long marks which could be from a belt or cane
- Stub marks from a cigarette
- Bruising on both sides of the ear (any symmetrical bruising is suspicious)
- Teeth marks from a bite
- Bruised eyes, especially if both at once
- A reluctance to go home, especially weekends
- Constant attention seeking behaviour
- Over-pleasing/compliant behaviour
- A tendency to run away from home

Sexual Abuse

The pupil:

- May behave in a precocious sexually provocative way
- May repeatedly openly masturbate

- May appear unhappy or isolated
- May have aggressive eruptions
- May be kept away from school medicals
- May have persistent problems with sleeping, nightmares, bedwetting
- May struggle with anorexia, bulimia, or excessive 'comfort eating'
- May be reluctant to go home
- May run away from home

Action: suspicion of abuse from observation

Any teacher who is concerned about a pupil based on any outward symptom must first inform the designated safeguarding lead. The DSL will then investigate and speak to the class teacher or nurse if necessary.

If there is concern about an injury, the child should be sent to the School Nurse to seek medical advice.

9. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have an EHC plan.
- Have mental health needs.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day. · Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral for assessment for statutory services if the pupil's situation is not improving or is worsening.

A risk register and a monitoring list has been created to help identify students who may need early help.

10.Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “**domestic abuse**” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

11.Child abduction and community safety incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils. Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

11. Child criminal exploitation (CCE)

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator · Through violence or the threat of violence
- Specific forms of CCE can include:
- Being forced or manipulated into transporting drugs or money through county lines. · Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

12. Cyber-crime

For the purposes of this policy, “**cyber-crime**” is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise.

13. Child sexual exploitation (CSE)

For the purposes of this policy, “**child sexual exploitation**” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator · Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil’s immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

14. Modern slavery

For the purposes of this policy, “**modern slavery**” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery.

15. FGM

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in Tunisia as a result of Article 22 of the Penal code.

Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the DSL where an act of FGM appears to have been carried out. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.

- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “**honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

16. Radicalisation

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school’s wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil’s parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

17. The Prevent duty

Under section 26 of the UK Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as “**the Prevent duty**”. In Tunisia schools follow the same goal. The Prevent duty will form part of the school’s wider safeguarding obligations.

18. Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

19. Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

20. Mental health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education. Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s). The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

21. Child on Child abuse

For the purposes of this policy, "Child-on-Child abuse" is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including peer-on-peer abuse, as confirmed in the Child Protection and Safeguarding Policy's [statement of intent](#).

All staff will be aware that child on child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of peer-on-peer abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that peer-on-peer abuse is not occurring. All staff will speak to the DSL if they have any concerns about peer-on-peer abuse.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter" or "part of growing up".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyber bullying and prejudice-based or discriminatory bullying.

- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos. · Upskirting.
- Initiation- and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests

are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil's SEND and will always explore indicators further.

The school's response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of Child-on-Child abuse are outlined in the Child-on-Child Abuse Policy. Staff will follow these procedures, as well as the procedures outlined in the school's Anti-Bullying Policy and where relevant.

22. Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from another school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

23. Pupils potentially at greater risk of harm

The school recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

24. Pupils who need counselling support

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage. As a matter of routine, the DSL will hold and use information from the school counsellor to ensure decisions are made in the best interest of the child.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision of pastoral or academic support.

25. Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil

with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

26. Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to the DSL if needed.

27. Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

28. Work experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

29. The Five R's

Disclosure of abuse by the pupil: **The five Rs**

When a pupil actually discloses that he/she has been abused the following guidelines must be followed.

RECEIVE

Listen without shock, disgust or disbelief and accept what is said. To communicate "I believe you" is vital. (It may be that it is not true but that is not for us to decide.)

Give plenty of time and allow for plenty of silence.

REASSURE

It is helpful to the pupil if the adult is able to communicate something of the following: 'You're not to blame, it's not your fault'

'You're very brave to have told someone'

But do NOT make promises that you are unable to keep: "I'll stay with you"; "everything will be ok now"; "I won't let him hurt you again"; "I won't tell anyone"

REACT

Ask open-ended questions: "Is there anything else you'd like to tell me?"

Do not ask leading questions (e.g. 'did he also touch you anywhere shouldn't have done?') as this may invalidate any future legal proceedings.

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Do not ask 'accusing' questions: "Why didn't you tell someone earlier?"
"Why didn't you tell your Mum?"

Do not criticise the perpetrator. If it is a family member emotions are going to be horribly mixed but the family staying together may well be the preferred solution.

Do not ask the pupil to repeat it all for any other member of staff.

RECORD

Make notes as soon as possible afterwards. Do not record your assumptions and interpretations, just what you heard and saw. Do not destroy original notes even if you later write things up more neatly and fully. Record date, place, time, any non-verbal behaviour and words used including 'pet' sexual words (if any used). Draw a diagram if bruising is apparent to give an exact location.

REFER

Confidentiality is an important principle but in cases of abuse no member of the School community can maintain absolute confidentiality. Confidentiality cannot be promised to the pupil who is disclosing.

The DSL will disclose any information about a pupil to other members of staff on a need to know basis only.

30. Essential Staff Action

In all cases the teacher/adult to whom the disclosure of abuse is made must immediately refer the matter to the DSL. If both of the DSL are unavailable then contact the Principal or Child Psychologist.

In all cases the DSL must be informed. The DSL will contact the psychologist who is a part-time member of staff and they will make the decision whether to refer or provide additional support with other inter-agency interaction.

Inevitably some pupils will ask or plead with the teacher not to tell anyone else. In these cases:

- Do not negotiate with the child, but do firmly yet sensitively explain that you must refer the matter to the DSL. Whilst we may wish to give them a day to think it over, no teacher is in the position to do so. The matter must be referred before the end of the school day.
- Do allow him/her to voice his/her fears over "What is going to happen next?" The answer is that the DSL will report it to the Principal and/or the psychologist.
- In circumstances where the child is distressed, he/she should not be left unattended. Ensure another member of staff sits with him/her while you are telling the DSL.

Always remember that a child wants the abuse to stop. Any individual with concerns about a child or young person should share these with the DSL.

31. Support for Staff

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

We provide child protection training for all staff at the beginning of each school year and refresher courses are given at the beginning of each new term.

Teaching children how to keep safe

The School regularly informs its pupils about safeguarding, including online, through the curriculum and PSHE. Depending on the age group different areas are taught. Our aim is to help children to adjust their behaviours in order to reduce risks, including the safe use of electronic equipment and access to the internet. Common Sense Media (<https://www.common sense media.org>) The Safer Internet Centre (www.saferinternet.org.uk) and CEOP's Think u know website (www.thinkuknow.co.uk) all

provide us with information which we can share with children as part of their PSHE lessons and with parents.

32. Arrangements for dealing with allegations of abuse against members of staff

All School staff must ensure that no situation could arise involving any of us which could reasonably be construed as acting against the safety of each child. We all understand that it is not always an easy line to draw but crossing that line, or being in a position where it appears that the line has been crossed, is unacceptable, refer to the guidance in the Professional Code of Conduct (Staff Behaviour) Policy.

As a small school, there may be times when you are working with individual children. In these cases, you should keep the classroom door open and position yourself so that both you and the child can be seen from the door.

If you are at all concerned about anything which has occurred or which has made you uncomfortable you must inform the Principal at the earliest opportunity, even if it turns out that nothing untoward has happened. You must make a written record, dated and signed, of any such incident.

When an allegation of abuse is made against a member of staff, the School is committed to dealing with the allegation fairly, quickly and consistently, in a way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. If a pupil does make an allegation about a member of staff, the member of staff receiving the allegation will immediately inform the DSL who will inform the Principal.

The Principal will discuss this with the CEO and the psychologist.

If the allegation concerns the Principal, then the DSL will immediately inform the CEO.

Suspension of the member of staff, against whom an allegation has been made, needs careful consideration, and the Principal will take the matter directly to the CEO.

Pre-employment Checks

The School asks for the latest police clearance/disclosure certificate (and preferably certificates over the last 10 years) as part of the pre-employment checks.

Low-level concerns are any concerns, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the school's staff code of conduct, professional standards, or safeguarding expectations. This may include behaviour that does not meet the harm threshold but could indicate that an adult may pose a risk to children if left unaddressed. The school recognises the importance of creating a culture of openness, transparency and vigilance in which all concerns are shared,

recorded and dealt with appropriately and promptly. All staff are encouraged to report low-level concerns to the Designated Safeguarding Lead (DSL) or Headteacher without fear of judgement or reprisal, in line with the principles outlined in [Keeping Children Safe in Education \(KCSIE\) 2025](#). Records of low-level concerns will be maintained confidentially and reviewed to identify any patterns of concerning, problematic or inappropriate behaviour. The purpose of this approach is to safeguard children, maintain a strong safeguarding culture, and protect staff from misunderstandings or false allegations through clear and professional reporting procedures

33. Staff code of conduct/behaviour policy

See separate policy.

34. School recruitment procedures

The School recognises that all adults in school have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. Should any deficiencies or weaknesses in child protection arrangements be identified, by any member of staff, they must be notified immediately to the DSL so that they can be remedied without delay.

The School operates safe recruitment procedures including Disclosure and Barring Service Checks (or whatever is equivalent in countries staff have worked in), and pre-appointment checks on all staff. We will take up a minimum of 2 references for all staff.

As part of the recruitment procedures all new staff, must be provided with induction training that includes:

- the school's Child Protection and Safeguarding Policy;
- the Professional Code of Conduct (Staff Behaviour) policy;
- the identity of the designated person, DSL
- a copy of Part 1 of Keeping Children Safe in Education, July 2015

35. Single central record (SCR)

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

The following information is recorded on the SCR:

- An identity check to include copy of birth certificate and passport details
- A barred list check
- An enhanced Police check
- A prohibition from teaching check
- A check of professional qualifications, where required
- For expat staff record of ICPC
- Confirmation of receipt of suitable references

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced police check, the risk assessment will be recorded.

The school is free to record any other information it deems relevant.

36. Arrangements to fulfil other safeguarding responsibilities

Photography and Images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils:

- Agree and sign up to the School's Terms and Conditions;
- Parents give their consent for named photographs to be taken and published;
- ensure pupils are appropriately dressed;
- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

37. E-Safety

Most of our pupils will use mobile phones, tablets and computers at some time. However, we know that some men, women and young people will look to abuse such technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The School's e-safety policy explains how we try to keep pupils safe in School. Cyber-bullying by pupils, via texts and emails, is treated as seriously as any other type of bullying and is managed through our anti-bullying procedures.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access these sites in School. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites at home and we provide regular guidance through ICT lessons, PSHE lessons and assemblies.

Staff working in school must not use mobile phones whilst they are working with the children, except in the case of an emergency. If a mobile phone is used to take photos, the staff must delete the photo before leaving school. Photographs taken of the children should be part of planned activities and should be taken with school ipads only. A small number of parents have not given permission for their children's photos to be published. Staff must respect this decision of the parents and ensure they do not place such photos on the School website or any other publication without first contacting the parents.

38. Policy implementation

Listening to Children

An essential part of ensuring that we fulfil our duty of care involves listening to the pupils, to which end the School has established a network of structures which specifically enable as much.

Reviewed: April 2026/May 2026

Policy Prepared By:

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Date:	Date:
