

Toulon Child Protection Policy

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Local Document Code (if applicable) XXXXXXX	Associated documents Global Child Protection Guidelines Critical Incidents Guidelines Critical Incidents Flowchart	
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1. RATIONALE

The OSG EU Leadership Team sets policies and procedures aligned with the OneSchool Global Ethos, Values, and Vision. This Child Protection Policy outlines a clear approach to safeguarding and child protection, including responding appropriately to concerns arising both within the school and through a student's wider life. The policy reflects the school's legal and ethical responsibilities, including compliance with French legislation (Civil Code, Penal Code, and Code de l'Action Sociale et des Families).

2. PURPOSE

Toulon Campus as part of OSG EU is committed to fulfilling its duty of care to all students by:

- 5.1 Providing a learning environment that is safe, supportive, and caring.
- 2.5 Recognizing promptly when any student is at risk of harm.
- 2.6 Taking immediate and appropriate action to protect students when staff become aware of concerns that a student may be at risk of harm.
- 2.7 Ensuring all staff act in accordance with the highest moral and professional standards.
- 2.8 Complying with all obligations under French child protection legislation, including Civil Code Article 375 and Code de l'Action Sociale et des Familles Article L 221-1, which require reporting any known or suspected harm to children
- 2.9 For the purposes of this policy, a child is any person under the age of 18. Specific reporting obligations apply for children under the age of 15 in accordance with French Penal Code and child protection legislation.
- 2.10The school expects all staff, volunteer and visitors to uphold the commitments set out in this policy and to work collaboratively to maintain a safe learning environment.

3. SCOPE

This policy applies to all members of the school community, including staff, volunteers, contractors, students, parents, visitors and anyone involved with school activities in any way.

This policy applies to all interactions with children in person, online, or within family contexts related to school activities.

The policy forms part of staff onboarding and is shared with all trustees, volunteers, and individuals working with or around students.

This policy is available on the school website and to anyone who requests a copy.

4. POLICY AND PROCEDURES STATEMENT

5.1 Safe Learning Environment

- 5.1.1 The school must create and maintain a safe learning environment, educating all members of the school community about safeguarding and child protection issues.
- 5.1.2 Staff must be familiar with child protection protocols and act promptly when concerns arise.
- 5.1.3 Reportable allegations and misconduct will always be taken seriously.

5.2 Professional Development

- 5.2.1 The CA and Campus Principal will ensure that:
- 5.2.2 Staff will receive continuous professional development to support effective implementation of this policy.
- 5.2.3 Safeguarding and Child Protection protocols are monitored and reviewed regularly to ensure effectiveness.

5.3 Awareness of French Law

- 5.3.1 In compliance with Article L 221-1, Staff must understand their obligations under French child protection legislation, including reporting to authorities such as the **Public Prosecutor (Procureur de la République)**, and the **Child Welfare Service: Aide Sociale à l'Enfance**, and/or **Allô Enfance Maltraitée (119)** whenever they:
 - 5.3.2 have reasonable grounds to suspect that a student is at risk of harm; or
 - 5.3.3 become aware of a reportable allegation against a member of staff whenever or wherever the reportable conduct took place.

5.4 Failure to Act

- 5.4.1 Failure to act when aware of abuse or risk of harm to a child may constitute a criminal offense.

5. EMPLOYMENT

- 5.1 Toulon Campus may not engage any person, in child-related work without disclosure of any prohibitions under French law.
- 5.5 OSG EU must carry out all relevant procedures of background checking of a preferred applicant before employing or entering an arrangement with that applicant in paid or unpaid work. This includes overseas Police Checks for anyone who has previously resided in another country.

- 5.6 **Toulon Campus** must not commence employment or enter an arrangement with, or continue to employ or engage, in child-related employment or activities a person (whether as an employee, volunteer, contractor, or otherwise) that the school knows is a prohibited person.
- 5.7 If any person engaged with **Toulon Campus** becomes a prohibited person their engagement will be terminated immediately. A member of staff who becomes a prohibited person must immediately inform the school.

6. SITE SECURITY

6.1 The Campus Security & Visitor Policy and procedures will be followed. Visitors to the Campus are asked to sign in and are given a lanyard, which confirms they have permission to be on site.

6.2 Red lanyards denote a lack of appropriate checks for the role they are performing at campus, and those individuals must be always accompanied i.e. contractors. The Campus Principal will ensure supervision is in place for any visitor that does not have the appropriate checks

6.3 Teal lanyards denote those who are security cleared such as staff.

6.4 OneSchool Global Head Office staff will wear identification badges in the same teal and red colours, which have the same meaning. The Campus Principal may contact the OSG EU Head office at any time to verify the credentials of a visitor from the Head Office.

6.5 All visitors are expected to observe the campus' safeguarding and health and safety requirements to ensure children in campus are kept safe.

7. ROLES & RESPONSIBILITIES

The CP is responsible and accountable for Safeguarding/Child Protection at the Campus.

Safeguarding and Child Protection decisions are made by the CP (and Designated Safeguarding/Child Protection Lead (DSL), if the post exists in a Campus) in liaison with the Campus Child Protection Committee.

8. CHILD PROTECTION AND SAFEGUARDING PROCEDURES:

- 8.1 Any concern or allegation must be reported immediately to the Campus Principal and an incident report recorded on CPOMS (Child Protection Online Management System).
- 8.2 Staff must ensure that the CP reports the matter to the CA, Regional Principal and relevant authorities. If not satisfied, Staff have a legal duty to notify the relevant authorities as per French Legislation.
- 8.3 Authorities to notify as per French legislation:
- 8.4 Public Prosecutor (Procureur de la République)
- 8.5 **CRIP – Direction de l'Enfance et de la Famille (départemental du Var) crip83@var.fr / Phone: 04 83 95 74 19 /20/21**
- 8.6 Child Welfare Services / Aide Sociale à l'Enfance (ASE)
- 8.7 Allô Enfance Maltraitée (119)
- 8.8 Police or Gendarmerie (17 or 112) for immediate danger
- 8.9 Allegations against the CP, CA or senior leadership must be reported to the Regional Director of Safeguarding (RDS) and the Regional Principal (RP), who must then comply with the obligations under this policy.

- 8.10 Low-level concerns are not insignificant. Low level concerns do not alone require reporting to the relevant authorities, however low-level concerns must always be reported and documented to monitor patterns, on CPOMS.
- 8.11 The Campus Principal must ensure that all Campus staff are aware of and comply with the reporting procedures.
- 8.12 The Campus Principal and CA must ensure that no person reporting to the CP or CA under this section of this policy is disadvantaged as a result.

9. ALLEGATIONS ABOUT STAFF

- 9.1 OneSchool Global promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.
- 9.2 An allegation is any information which indicates that a member of staff, supply staff or volunteer or any other persons engaged in school active on or off campus grounds.
- 9.3 Behaved in a way that has harmed a child or may have harmed a child.
- 9.4 Possibly committed a criminal offence against or related to a child.
- 9.5 Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- 9.6 Behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behavior that may have happened outside an organisation that might make an individual unsuitable to work with children, this is known as transferable risk) ||
- 9.7 We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Campus Principal.
- 9.8 The Campus Principal on all such occasions will discuss the content of the allegation with the local authority designated officer (17 or 112 / CRIP VAR, Public prosecutor – 119 allô enfance in danger as an help)
- 9.9 If the allegation made to a member of staff concerns the Campus Principal, the person receiving the allegation will immediately inform the Reginal Principal and Regions Director of Safeguarding who will consult the (17 or 112 / CRIP VAR, Public prosecutor – 119 allô enfance in danger as an help) without notifying the Campus Principal first.
- 9.10 LOW LEVEL CONCERNS
- 9.11 All low-level concerns are reported to the Campus Principal, who keeps a record of the concern and actions taken.
- 9.12 These records are reviewed monthly during the Child Protection Campus committee meeting, to monitor patterns of behaviour over time.
- 9.13 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern may be that an adult working in or on behalf of the school may have acted in a way that;
- 9.14 is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- 9.15 does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to external authorities, examples of such behaviour could include, but are not limited to;
- 9.16 being over friendly with children
- 9.17 having favourites
- 9.18 taking photographs of children on their mobile phone

9.19 The culture of our school is such that staff are encouraged to pass on low level concerns to the Campus Principal. These concerns will be recorded and dealt with appropriately.

9.20 Ensuring they are dealt with effectively will also protect those working in or on behalf of the campus from potential false allegations or misunderstandings.

9.21 COMPLAINTS

9.22 Complaints from parents or pupils about the school's response to child safeguarding will be addressed using the Complaints Policy.

10. RISK MANAGEMENT

10.1 Pending completion of any investigation (whether by the school or an external authority / third party), the school may limit the contact the member of staff is to have with students or other staff, direct the member of staff to undertake duties other than normal duties or at different locations or suspend the member of staff (but on normal pay).

1.1 Before taking such action, the school must consider what risk, if any, the member of staff might pose to students. The school must consider all relevant circumstances, including (but not limited to):

1.2 The nature of the allegation;

1.3 The vulnerability of the students (for example, because of their age, support needs);

1.4 The nature of the position occupied by the member of staff;

1.5 The extent to which the member of staff is supervised;

1.6 The disciplinary record of the member of staff;

1.7 The safety of the member of staff; and

1.8 The extent to which the investigation could be compromised by the member of staff continuing his or her normal duties.

1.9 Any action taken by the school under this section of the policy is not an indication that the school has made, or is likely to make, any particular findings in relation to the allegation against the member of staff. A fair and reasonable process will be followed to investigate the allegations.

11. INVESTIGATION

11.5 This section of the policy applies independent of any investigation that is being carried out by the Police, the *Education Nationale* or another authority.

11.6 Investigations must be carried out in a way which affords procedural fairness to the member of staff involved. This means that, before completing an investigation of a reportable allegation, the member of staff should be informed of the substance of the allegation against them and provided them with a reasonable opportunity to put their case forward (if requested by the member of staff, with the assistance of a support person of the member of staff's choice).

11.7 Normally, the Regional Director of People and Culture and RDE decide the timing and the particular form this will take, ensuring the investigation is not compromised. It also means that the Regional Director of People and Culture and RDE must:

11.8 Act fairly and without bias;

11.9 Conduct an investigation without undue delay;

11.10 Ensure the case is not investigated or determined by someone with a conflict of interest;

11.11 Ensure the outcome is supported by evidence;

11.12 Take steps to maintain confidentiality for the sake of all parties involved in the investigation.

- 11.13 At the conclusion of the investigation, the Regional Director of People and Culture and RDE will communicate the outcome.
- 11.14 If it is found that the allegation against the member of staff is true, the school will follow its usual disciplinary process, and direct the member of staff to take the following actions:
- 11.15
- 11.16 If the breach is minor, resulting from a misunderstanding of how certain words or behaviour were understood, the school may require that the member of staff undertake coaching, professional development, and/or a commitment not to repeat the offence;
- 11.17 In serious cases, the school may suspend or terminate the employment of the member of staff.
- 11.18 In most cases, the Regional Director of People and Culture should advise the victim and the member of
- 11.19 staff in writing of the result of the investigation and the action taken. If the member of staff is unhappy with the conduct or result of investigation, they may take their complaint further to the OSG EU Board of Trustees and, if dissatisfied with the Board's response, the *Education Nationale*, the Police or any other relevant authority depending on the circumstance
- 11.20 The Regional Director of People & Culture must, as soon as practicable, be satisfied that the investigation has been concluded:
- 11.21 Save copies of any reports to and of all relevant statements taken in the course of the investigation and of all other documents on which the report is based.
- 11.22 Where necessary provide the appropriate external agencies with such comments.
- 11.23 Inform relevant parties that appropriate action has been taken.

12. PASTORAL CARE

- 9.1 Where a student is at risk of harm or is the person to whom the reportable conduct has allegedly been directed, the school must as soon as possible advise the student's parents or caregivers.
- 9.2 The school may choose not to inform the student's parent or caregiver if the school is satisfied that it will not be in breach of its duty of care to the student or to other students by not advising the student's parents or caregivers.
- 9.3 The school will endeavour to: Make available its support staff and external agencies (where appropriate) to provide counselling and other support as required to:
- 9.4 Any student who is at risk of harm or is the person to whom reportable conduct has allegedly been directed; and where relevant, their families.
- 9.5 Any member of staff against whom a reportable allegation has been made; may be directed to external agencies able to provide relevant care and support.

This policy fully incorporates the French legal obligations, including reporting duties, protection measures, and procedural guidance from the **Civil Code**, **Code de l'Action Sociale et des Familles**, and internal OneSchool France standards. If you notice any discrepancies, please contact the campus principal.