



## St. Helen's College

### CHILD PROTECTION AND SAFEGUARDING POLICY

#### KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	<ul style="list-style-type: none"> <li>• Rob Wratten TEL: 01895 250975 EMAIL: <a href="mailto:rwratten@hillingdon.gov.uk">rwratten@hillingdon.gov.uk</a></li> </ul>
<b>Local Authority Children's Social Services</b>	TEL: 01895 556644 EMAIL: <a href="mailto:lbhmash@hillingdon.gov.uk">lbhmash@hillingdon.gov.uk</a> OUT OF HOURS EMERGENCY: 01895 2501
<b>Child Protection Officer</b>	Suzy Gladish Tel: 01895 277 463 Mobile: 07702 989 901 (voicemail enabled)
<b>Multi-Agency Safeguarding Hub</b>	TEL: 01895 556644 EMAIL: <a href="mailto:lbhmash@hillingdon.gov.uk">lbhmash@hillingdon.gov.uk</a>
<b>Support and Advice about Extremism</b>	<p><b>Police</b>            EMERGENCY: 999            NON EMERGENCY NUMBER: 101            EMAIL: <a href="http://www.met.police.uk/">http://www.met.police.uk/</a></p> <p><b>Local Authority</b>            Fiona Gibbs            TEL: 01895 556633            EMAIL: <a href="mailto:fgibbs@hillingdon.gov.uk">fgibbs@hillingdon.gov.uk</a>            PREVENT LEAD: Fiona Gibbs</p> <p><b>Department for Education</b>            NON EMERGENCY NUMBER: 020 7340 7264            EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a></p>
<b>NSPCC whistleblowing advice line</b>	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>
<b>National College for Teaching and Leadership</b>	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday - Friday 8am - 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>

## KEY SCHOOL CONTACT DETAILS

<b>Governors</b>	<b>Principal with oversight for Safeguarding</b> Dominic Crehan TEL: 01895 234371 EMAIL: dcrehan@sthelenscollege.com
<b>Designated Safeguarding Lead (DSL)</b>	<b>DSL for the Upper School</b> Teresa Stark TEL: 01895 234371 tstark@sthelenscollege.com  <b>DSL for the Lower School</b> Lucy Hunt TEL: 01895 455542 EMAIL:lhunt@sthelenscollege.com
<b>Head</b>	Shirley Drummond TEL: 01895 234371 EMAIL: sdrummond@sthelenscollege.com

## POLICY STATEMENT

This policy applies to St. Helen's College ("the School") and includes the EYFS setting. This policy is reviewed and updated annually and is available on the School website or in hard copy by request.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2018) ('KCSIE')
  - Disqualification under the Childcare Act 2006 (June 2016)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (March 2015)
  - Information sharing: advice for practitioners providing safeguarding services (March 2015)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
  - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
  - The use of social media for on-line radicalisation (July 2015)

This policy also takes into account the procedures and practices of London Borough of Hillingdon as part of the inter-agency safeguarding procedures set up by the Safeguarding Children Board.

## AIMS

This policy is designed to ensure that all staff are clear about their responsibilities with regard to the promotion of pupils' welfare and the actions necessary should they have a concern about a possible child protection issue. Its aims are:

- to encourage the promotion of opportunities to help children to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well being;
- to raise the awareness of all staff and identify responsibility in reporting concerns about a) pupils in need\*; b) pupils at risk and c) possible cases of abuse, which might constitute neglect, physical, sexual or emotional abuse;

- to ensure effective communication between all staff when dealing with child protection issues and
- to lay down the correct procedures for those who encounter an issue of child protection.

\*Children in need are defined in law as children who are aged under 18 and need local authority services to achieve or maintain a reasonable standard of health or development, need local authority services to prevent significant or further harm to health or development, or are disabled.

## **CONCERNS ABOUT A CHILD**

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility. Any concerns about a child **MUST** be communicated. Assessments of children should consider the wider environmental factors affecting the child's life that may pose a threat to their safety and/or welfare.

## **DEFINITIONS OF SAFEGUARDING AND SIGNS AND TYPES OF ABUSE**

Safeguarding and promoting the welfare of children is 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; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse and/or
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

## **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

### **Early Help**

All staff are expected to identify when a child may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. KCSIE 2018 includes the following as indicators that a child may need early help:

- The child is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- The child is at risk of modern slavery, trafficking or exploitation.
- The child is showing early signs of abuse and/or neglect.
- The child is at risk of being radicalised or exploited.
- The child is a privately fostered child.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Hillingdon referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration leading to a referral to children's social care if the pupil's situation does not appear to be improving.

## Disclosures or suspicions

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. They should:

Receive	Reassure	Respond	Record	Refer
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Receive what is said

- Accept what you are told – you do not need to decide whether or not it is true.
- Listen without displaying shock or disbelief.

Reassure the pupil

- Acknowledge their courage in telling.
- Remind them that they are not to blame (but avoid criticising the alleged perpetrator – young people often love adults who abuse them).
- Never promise confidentiality, only discretion.
- Reassure them, but do not promise what you may not be able to deliver 'everything will be all right now' (it may not be).

Respond

- Respond to what the child has said, but do not interrogate.
- Avoid leading questions such as 'Was it your father? Did he touch your bottom?' Questions such as these can be used by defence counsel in a subsequent court case to suggest that you 'contaminated' the child's evidence.
- Ask open ended questions: 'Do you want to tell me anything else?' 'And?' 'Yes?'
- Where necessary, clarify what has been said to you so that you are clear and able to decide whether this is an abusive situation.
- There is a careful judgement to be made in ensuring that you have enough information to make an appropriate referral and allowing a child to talk without being silenced, while making sure that you have not inadvertently led him/her perhaps by an assumption behind a question.
- Explain what you will do next.

Record

- Make brief notes as soon as possible. Sign, date and time the notes.
- Keep original notes, then write up subsequent record – include date, time, place. Describe observable behaviour.
- Record the actual words the child uses.

Refer

- Refer the matter within 24 hours with all relevant details to the Designated Safeguarding Lead.
- The DSL may ask you to record the key facts in the form contained at the end of this policy.
- For allegations against a member of staff or the Head, see appendix 2 below.

If staff (including Principals and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action although staff can make a direct referral to children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL (or the person who made the referral) should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

## **Child Protection Concerns and Disclosures – Action to be taken by DSLs**

The DSL will take action as appropriate and in line with published local referral thresholds. This might involve telephoning the Hillingdon Referral and Assessment Team for advice and notifying children's social care of the concerns and then following up with a written referral within 24 hours of the disclosure or suspicion of abuse. If a child is in immediate danger or is at risk of harm, the DSL will make an immediate referral to children's social care or to the police.

The DSL must take any steps needed to protect any pupil involved from risk of immediate harm. S/he must not interview or investigate the allegation further, but refer to the Hillingdon Referral and Assessment Team at Hillingdon Social Care within 24 hours of an allegation or suspicion of abuse and follow their advice on further action.

Children who have suffered or are likely to suffer significant harm should be reported to the Hillingdon Referral and Assessment Team immediately. Children who are in need of support from one or more agencies should be referred for inter-agency assessment using local processes including the Common Assessment Framework and Team Around the Child (TAC) approaches.

When deciding whether to make a referral, following an allegation or suspicion of abuse, the DSLs should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the Hillingdon LADO.

Agree with Hillingdon Referral and Assessment Team (and record in writing) any necessary next steps in relation to a) informing the pupil's parents; b) further communication with the child concerned; c) medical examination or treatment; d) immediate protection for the victim or a pupil who has given information about an abuser or a pupil against whom an allegation has been made; e) informing other people at the school. (Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.)

Inform the pupil or adult who made the initial allegation of what the next steps are to be. The views of the child concerned should be listened to and respected, although it might not always be possible to be led by them.

Inform the Head of the allegation and action taken. Keep full written records.

### **What staff should do if a child is in danger or at risk of harm**

If staff (including Principals and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. **Anyone** can make a referral. Any such referral must be made immediately and in any event within 24 hours of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Board is Hillingdon. A full copy of their local procedures can be found [HERE](#).

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Principal with oversight for Safeguarding, Head, DSL to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

### **What staff should do if they discover or suspect an act of Female Genital Mutilation ('FGM')**

Staff must report to the Police cases where they discover – or suspect - that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix A of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if a child goes missing from education**

When children go missing from education, particularly on repeat occasions, this is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education are as follows.

Parents of children who are absent from school are required to report a reason for the absence, and this information is coded in the registers. Admin staff follow up unexplained absences with parents if they have not made contact with a reason for absence by 10 a.m.

Any case in which a child's absence gives cause for concern, because a parental explanation is not forthcoming, reasonable or credible or because a pattern of lateness or absence has developed, is referred to the Head, Deputy Head or Head of Lower School who will contact the parents directly.

The school will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of ten school days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

The school will inform the local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period or
- have been permanently excluded.

The local authority must be notified when a school is to delete a pupil from its register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. It is essential that the school complies with this duty, so that the local authority can, as part of its duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

### **WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT ANOTHER STAFF MEMBER**

- If staff have concerns about another staff member, then this should be referred to the Head
- If staff have concerns about the Head this should be referred to the Principals;

- An allegation of abuse against the Head must be referred immediately to the Principals; the Principals must then inform the LADO without the Head being informed.

### **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)**

The School's procedures for managing allegations against staff who are currently working in the School follow Department for Education statutory guidance and Hillingdon Local Child Safeguarding Board arrangements and apply when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil; or
- behaved towards a pupil in a way that indicates that they would pose a risk of harm if they were to work regularly or closely with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should also be referred to the Police.

If anyone makes an allegation against a member of staff or volunteer, the member of staff receiving the allegation must inform the Head immediately; the Head must then inform the LADO. If the Head is unavailable, the member of staff receiving the allegation should contact the LADO directly, without delay. An allegation of abuse against the Head must be referred immediately to the Principals; the Principals must then inform the LADO without the Head being informed. An allegation of abuse against one of the Principals must be referred immediately to the LADO without the Principal being informed. In the case of serious harm, the police must be notified from the outset.

Any allegation of abuse made against a Principal, the Head, member of staff or volunteer will be dealt with 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.

Full details of procedures to be followed when an allegation is made against a member of staff are provided in Appendix 2.

The school is aware that procedures need to be applied with common sense and judgement. If an allegation is made against a teacher the quick resolution of that allegation will be a clear priority to the benefit of all concerned. Staff suspension will not be the default option - an individual will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the individual notified of the reasons.

The school will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

Written records must be kept throughout of all evidence, discussions, decisions and actions taken.

If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

## **WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT SAFEGUARDING PRACTICES IN THE SCHOOL**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, these should be raised in accordance with the School's whistleblowing procedures which can be found [HERE](#). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## **ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS**

KCSIE 2018 Part 5 gives specific guidance on Peer on Peer abuse. Peer on peer abuse includes, but is not limited to, bullying (including cyberbullying), gender based sexual violence/assaults, sexting and initiation/hazing type violence, sexual harassment.

Staff are required to be vigilant for abuse between pupils where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm and to inform the DSL of their concerns or any allegations made. The safety of pupils is paramount and a pupil may be temporarily excluded as a neutral act pending an investigation.

Staff must ensure that abuse is recognised for what it is and is not passed off as 'banter' or 'part of growing up', and should follow the protocols outlined above for referrals of abuse. For recognising signs of abuse, see appendix A.

A distinction may need to be made between a one-off act of abusive behaviour such as a physical assault, which may be considered under the Anti-Bullying Policy, and one which should be referred to the LA.

Acts of a non-consensual sexual nature or use of words and behaviour which threaten abuse, will always be referred to the LA, or at the very least the LA will be consulted for advice.

The school is aware that a pupil who is found to be abusing another pupil or other pupils or one who is beginning to display bullying behaviours may be the victim of an abusive relationship and to be 'at risk'. All such concerns must be shared with the DSL. Staff should be especially vigilant of relationships between pupils with a wide age gap and be prepared to communicate any concerns to the DSL.

The School will take advice from the LA on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. A multi-agency approach will be adopted, using provision and colleagues from a range of services including the NHS, social services and probation. Each child involved will have, at school, a member of staff allocated to provide support and counselling as necessary. In the case of sexting, the guidance provided by CEOP will be followed.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Hillingdon LSCB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Hillingdon LSCB, parents are informed as soon as

possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the Hillingdon LSCB and/ or the Police as appropriate

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by DSLs and support from external agencies will be sought, as appropriate. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

### **Procedures to minimise the risk of Peer on Peer abuse**

We will minimise the risk of peer-on-peer abuse by:

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual image;
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- ensuring our curriculum helps to educate pupils about appropriate behaviour and consent;
- ensuring pupils know they can talk to staff confidentially and
- ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

### **STAFF CODE OF CONDUCT**

The Staff Behaviour Policy can be found [HERE](#). The aim of this code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

### **SAFER RECRUITMENT**

The School is committed to safer recruitment processes. All members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Principals and volunteers to work with children and young people are set out in the School's [Safer Recruitment Policy](#).

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriate supervised is set out in the School's [Safer Recruitment Policy](#).

### **MANAGEMENT OF SAFEGUARDING**

The School's DSLs are Teresa Stark (TMS) and Lucy Hunt (LCH) who are both members of the SLT. TMS is the Designated Safeguarding Lead for the Upper School and LCH for the Lower school, including Early Years and Ducklings. If either DSL is unavailable, the other will take responsibility for safeguarding matters across the school as a whole. The DSLs take joint responsibility for Safeguarding during Funtasia and Holiday Club.

The DSLs' contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSLs work with the Principal with Oversight for Safeguarding to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSLs regularly review the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSLs will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. The DSLs take joint responsibility for Safeguarding during Funtasia and Holiday Club. Full details of the DSL's role can be found at Annex B of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSLs and this responsibility should not be delegated.

## **TRAINING**

Induction and training are in line with advice from Hillingdon Safeguarding team.

### **All Staff**

All new staff will be provided with induction training that includes:

- the Safeguarding policy, including information about the identity and role of the DSLs;
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media and
- a copy of Part 1 of *KCSIE*.
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE*.

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are provided with all of the above.

All staff are also required to:

- Read Part One of *KCSIE* and confirm that they have done so. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via appropriate means. Records are kept to confirm that all have read and understood the latest version.
- Understand key information contained in Part One of *KCSIE*. The School will ensure staff understanding by use of an online training and testing module.
- Receive training in Safeguarding and child protection regularly, in line with advice from the Hillingdon Safeguarding team. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism, are able to challenge extremist ideas, and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails, e-bulletins and staff meetings.

## DSLs

The DSLs receive updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Hillingdon Safeguarding team's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*. Training should allow the DSL to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

In addition to their formal training, the DSLs' knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

## OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Dominic Crehan is the Principal with oversight for Safeguarding. While the safeguarding duties remain the responsibility of the proprietor group as a whole, Dominic Crehan (Principal) is designated to take responsibility for the safeguarding arrangements in the School.

The DSLs undertake an annual review

- of the school's child protection policies and procedures and of the efficiency with which the related duties have been discharged and
- to confirm that the school contributes to inter-agency working in line with WTTSC through effective implementation of child protection policy and procedures and effective communication and good cooperation with local agencies.

The implementation of these policy provisions will be checked by scrutiny of the relevant minutes and available evidence underpinning the review (e.g. training records, referral information in respect of requests for help and support for individual children, issues and themes which may have emerged in the school and how these have been handled, and the contribution the school is making to local discussions on safeguarding matters).

The DSLs report the findings from the annual review to the Principals and Head, who analyse the report, question the DSLs and may recommend further scrutiny or changes to procedures.

All staff have regular appraisals and/or reviews with the Head or member of the SLT. These meetings provide opportunities to discuss any concerns they may have about welfare and safeguarding matters. At the termly staff meetings, the Head and DSLs remind staff of the personal and professional duty to report welfare and safeguarding concerns to the designated safeguarding lead, or in the absence of action, directly to local children's services, and staff are invited to raise concerns or questions for discussion. Safeguarding is a standing item on the agenda at weekly SLT meetings, weekly staff meetings and weekly briefing. It is on the agenda at Governance meetings once a term.

This policy is updated at least annually, and in doing so the DSLs draw upon the expertise of the staff in shaping the safeguarding arrangements. The DSLs ensure that any deficiencies or weaknesses in the school's child protection arrangements are remedied without delay.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

## **THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching children how to keep safe**

The Principals ensure that all pupils are taught about safeguarding, including online, through the curriculum and PSHCE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Note that abuse can take place wholly online or technology may be used to facilitate offline abuse.

Internet safety is an integral part of the School's IT curriculum and also embedded in PSHCE and Relationships and Sex education.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's [Internet & E-Safety Policy](#), which also includes detail on the use of mobile technology in school (and accessing 3G and 4G technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

### **Looked after children**

The Principal with oversight for Safeguarding ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority. KCSIE 2018 also highlights the need to treat previously looked after children as vulnerable.

### **Arrangements for Visiting Speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.

The School keeps a formal register of visiting speakers retained in line with its [Data Protection Policy](#).

### **Other safeguarding responsibilities**

These are detailed in the Safer Recruitment, Induction, Anti-bullying, Internet, Missing Child, Co – curriculum , Parent Helper, Whistleblowing, Pastoral Care, Behaviour and Discipline, Equal Opportunities, Transition, Medical, Asthma, Anaphylaxis, Diabetes, First Aid and

Welfare, Staff Code of Conduct, EYFS, Data Protection and Confidentiality, Healthy Eating, Physical Activity and Sex and Relationships policies.

All doors to rooms where pupils are involved in 1 to 1 teaching or conversations are fitted with a glass panel.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check every three years whether those staff are disqualified under the Childcare Act 2006. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Safer Recruitment policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. [This includes the date disqualification checks were completed.]

Where a member of staff is found to be disqualified, or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

### **Use of mobile phones and cameras**

Staff are not permitted to use their personal mobile devices or cameras in school except for approved school business. Staff who wish to take photographs or video of pupils (whether on a personal or school device) must first speak with the Head to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting. The exception is that parents are permitted to use personal devices to film or take photographs at performances. Reminders are always issued to parents before performances that any photographs and/or footage should be kept private and, in particular, that they must not be shared via social media channels.

### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the Early Years settings is Lucy Hunt.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere)

### **Disqualification from Association**

Staff who are disqualified may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children.

Person responsible	TMS
Date of last update	September 2018
Review Frequency	1 year

Next review	September 2019
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## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

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

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. 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 cyberbullying), 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:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child Sexual Exploitation:** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

**So Called 'Honour Based' Violence:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

**If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.**

There is a statutory duty on teachers - a legal requirement - to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18], teachers should follow the School's local safeguarding procedures.]

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties

and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

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 may contribute to vulnerability which are often combined with specific influences such as family, friends or online, 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 have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Special Educational Needs and/or Disabilities:** Pupils with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

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

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

**Lesbian, Gay, Bi or Trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

## **Appendix 2 Allegations Against Staff**

All actions will be in accordance with most recent DfE Guidance. Part 4 of KCSIE (2018) provides guidance on this issue.

In general, an allegation should be made if a teacher or other member of staff has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

An allegation will indicate that a person may be unsuitable to continue to work with children in his or her present position, or in any capacity.

If a pupil makes an allegation against a member of staff or volunteer, the member of staff receiving the allegation must inform the Head immediately the Head must then inform the LADO. If the Head is unavailable, the member of staff receiving the allegation should contact the LADO directly, without delay. An allegation of abuse against the Head must be referred immediately to the Principals; the Principals must then inform the LADO without informing the Head. An allegation of abuse against one of the Principals must be referred immediately to the LADO without the Principal being informed. In the case of serious harm, the police must be notified from the outset.

Any member of staff (including volunteers) can make a referral to children's social care if there is a risk of immediate serious harm to a child. However, although staff can approach children's social care services directly in exceptional circumstances, they are expected to raise concerns with the school's designated safeguarding lead in the first instance.

Any allegation of abuse made against a Principal, the Head, member of staff or volunteer will be dealt with 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 the allegation is made against a volunteer, supply teacher, contractor etc. an investigation will necessarily involve the organisation or agency of employment. For those who are self-employed, the allegation will be passed directly to the LA team for advice or action.

### **Procedures following an allegation of abuse by a member of staff**

When an allegation of abuse by a Principal or Head is referred to the LADO, LCSB procedures will be followed as directed by the LADO.

When an allegation has been made about a member of staff or volunteer, the Head (unless the allegation is made against the Head) will:

- get written details of the allegation, signed and dated by the person reporting it, and countersigned and dated by the Head;
- check that the allegation is not demonstrably false (e.g. member of staff not in school on day of alleged incident);
- collate information and personal details about the child concerned, the person against whom the allegation has been made, and any witnesses;
- contact the Local Authority Designated Officer (LADO) within one working day of receiving the report of an allegation. Discussions will be recorded in writing and communication with both the individual and the child concerned agreed.
- inform the person reporting the allegation of the action taken;
- as soon as possible after consulting with the LADO, inform directly the person about whom the allegation has been made (in accordance with any restrictions on information sharing that may be imposed by the police or Social Care);
- decide, after consultation with the LADO, whether the person about whom the allegation has been made should be suspended from work pending investigation;
- help all parties understand the process throughout;

- keep clear and comprehensive written notes about the allegation, including actions taken and decisions reached. These records must be kept in the accused person's confidential personnel file (kept until the person reaches the normal retirement age or for 10 years – whichever is longer) and a copy given to the person concerned. (The school will provide information regarding an allegation for the purposes of future references and DBS disclosures.)

Informing parents/carers of child concerned must only be done following consultation with the LADO.

Whenever a person is interviewed as part of an investigation, he or she is entitled to choose a representative to act as a witness to proceedings.

If the allegation is found not to be substantially false or unfounded, it will usually be the case that the LA will action a strategy discussion for the protection of the child concerned or will contact the police for further investigation.

If the child is not likely to suffer significant harm, but a criminal offence has been committed, the police will be informed directly.

If it is decided that the allegation does not involve a criminal offence and/or does not require formal disciplinary action, the Head will institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

According to the terms of the teacher's contract, the Head may suspend a member of staff whilst an investigation is progressing, dependent on the seriousness of the case. Suspension will always occur if there is cause to suspect a child is at risk of significant harm. The decision to suspend remains with the Head. Suspension is a neutral act and not an indication of guilt. Those who are members of a union are advised to contact the union at the outset.

Parents or guardians of a child concerned will be told about the case, if they do not already know, and will be kept informed of the progress, including the outcome, (in accordance with advice from the LADO and the police) but not the details of any disciplinary process.

If the allegation is found to be false, and the person has been suspended, then the school will support him or her as best it can, perhaps with the provision of a mentor, to return to work, and will attempt to minimise contact with the pupil(s) involved in making the allegation if they remain at school. The school will consider serious disciplinary action against a child who has been found to make deliberately false allegations.

If the allegation is substantiated, the decision whether to dismiss the member of staff is at the discretion of the Head. A criminal offence, regardless of significant harm to a child, would be considered as gross misconduct and is liable to dismissal. The school will report the dismissal of any member of staff, whether employed or contracted or volunteer or student, following a substantiated allegation within one month of the person leaving.

- The Disclosure and Barring Service PO Box 181, Darlington, DL1 9FA
- Telephone number for DBS referrals and safeguarding matters: 01325 953 795

At the Early Years Foundation Stage, the school will inform Ofsted within fourteen days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises being made (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The school will promptly report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment

agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required nor can an individual's refusal to cooperate with an investigation.

Consideration will be given to making a referral to the TRA when a teacher has been dismissed (or would have been had they not resigned) and a prohibition order may be appropriate because of unacceptable conduct or a conviction at any time for a relevant offence. The reasons such an order would be considered are: 'unacceptable professional conduct', conduct that may bring the profession into disrepute' or 'a conviction, at any time, for a relevant offence'. Further guidance is published on the TRA website.

The school should preserve confidentiality and guard against unwanted publicity for the member of staff against whom an allegation has been made. Restrictions apply until the point when the accused person is charged of an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made at the school's procedures or practice to help to prevent similar events in the future.

## **Appendix 3: Safeguarding - Good Practice for Staff**

### PE, music and other activities which require physical contact

Some staff – for example who teach PE and games or provide music tuition or who administer first aid - will on occasions have to initiate physical contact with pupils in order to support a child so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument, assist them with an exercise or to tend to an injury. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity. Staff should

- consider alternatives where it is anticipated that a pupil might misinterpret any such contact, perhaps involving another member of staff or a less vulnerable pupil in the demonstration;
- ask permission before making contact and
- always explain to a pupil the reason why contact is necessary and what form that contact will take.

Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child. Staff must remember:

- never touch a child in a way which may be considered indecent;
- always be prepared to explain actions and accept that all physical contact may be open to scrutiny;
- never indulge in horseplay, tickling or fun fights;
- never use an object to make physical contact;
- physical contact should never be secretive, or for the gratification of staff, or represent a misuse of authority.

If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded in writing as soon as possible and given to the DSL.

### Physical Intervention

There may be times when a member of staff, in the course of duty, uses physical intervention to restrain a child. This is permissible only to avert an immediate danger of personal injury to, or the immediate danger to the property of, a person (including the child him/herself). The member of staff involved must report any such incident to the DSL immediately.

### Humiliation

Staff must take care never deliberately to use language, gestures or body language which could cause humiliation or embarrassment to a child. Sarcasm, unmeasured criticism and shouting at children are not allowed.

### Residential Trips

Pupils must only stay in accredited, official and recognised venues. Supervising staff must be vigilant if the venue is also being used by other organisations at the same time.

Staff must be mindful that pupils away from home are in a particularly vulnerable position and must be sensitive to their feelings, taking particular care to ensure personal privacy.

Staff should:

- always knock and request permission before entering a dormitory;
- not enter pupil shower rooms, bathrooms or toilets unless in an emergency;
- not use pupil shower rooms, bathrooms or toilets which are specifically designated for pupil use;
- wear a dressing gown over their nightclothes if they need to attend to pupils during the night.

Where possible, there should be two members of staff allocated to pupil supervision in each sleeping area (building). In the run up to bedtime, during the night and while pupils are dressing on the morning, girls may only be supervised by female staff. Boys, if possible, should be supervised by male staff, although female staff may be used if males are not available.

### Changing and Showers

Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be a required level of supervision to safeguard young people and satisfy health and safety considerations and to ensure that bullying or teasing does not occur. The supervision will need to be appropriate to the needs and age of the young people concerned.

Staff, therefore, need to be vigilant about their own behaviour. This means that staff should:

- announce their intention of entering changing rooms;
- avoid remaining in changing rooms unless a pupil's needs require it;
- avoid any physical contact when children are in a state of undress;
- avoid any visually intrusive behaviour;
- not change in the same place as children;
- not shower with children.

### One to One situations

When staff work in one-to-one situations with pupils, perhaps in a pastoral role, music tuition or learning support activity, they need to be aware that this could provide an opportunity for unfounded allegations to be made. Teachers and others should recognise this possibility and plan and conduct such sessions accordingly.

This means that staff should:

- avoid meetings with pupils in remote secluded areas of school;
- ensure there is visual access or an open door and sit so that they and the child concerned can be seen;
- not cover glass door panels;
- inform other staff of the meeting beforehand, assessing the need to have them present or close by and avoid use of 'engaged' or equivalent signs wherever possible as such signs may create an opportunity for secrecy or the interpretation of secrecy;
- publish a list of planned tutorials/lessons on a door.

### Transporting children

In certain situations e.g. out of school activities or medical emergencies, staff or volunteers may be required to transport children. Parental permission must be obtained for such transport. Staff should not transport children alone. Children should sit in the back of a car only, with seatbelts on.

### First Aid and Administration of Medication

Only staff who are trained should administer First Aid. Ideally, First Aid and administration of medicine should be carried out by the welfare staff.

When administering First Aid, staff should ensure that other adults are aware of the action being taken, whenever possible. Parents should always be informed when First Aid has been administered. Staff should make other staff aware of the task being undertaken and explain to the child what is happening. Where necessary, children should be allowed to dress and undress in private.

### Pupils in Distress

There may be occasions when a distressed pupil needs comfort and reassurance. This may include appropriate physical contact. Staff should remain self-aware at all times to ensure that their contact is not threatening or intrusive and not subject to misinterpretation.

This means that staff should:

- consider the way in which they offer comfort to a distressed pupil;
- provide such support in the presence of another member of staff or always tell a colleague when and how they offered comfort to a distressed child;
- record any situation which may give rise to concern.

### Intimate Care

Intimate care in Ducklings may involve

- dressing and undressing (underwear)
- helping someone use a potty or toilet
- changing nappies
- cleaning, wiping and washing intimate parts of the body.

When intimate care is necessary a second adult is made aware and records are kept and parents informed.

From Nursery: children are encouraged to be ready for independent toileting before coming into the Nursery. If this is not yet possible pupils are given wet wipes to use. If there has been an accident or the child is unable to maintain good hygiene through the use of wet wipes, then an adult carer will alert the second adult in the room and go to the child's assistance. This help is carried out in as public a place as possible, allowing for hygiene and self-esteem issues. This guideline is used for any other accidents around school, on school visits or in the unusual case of an older child.

The wipes and spare clothes are in clearly labelled storage near the toilets in all Lower School blocks and in the medical room at the Upper School.

In the case of persistent difficulty, the child's parents will be asked to either contact their own Health Visitor or GP.

### Photography and Video

Many school activities involve the taking of images. These may be undertaken as part of the curriculum, co-curricular activities, for publicity, or to celebrate achievement.

Using images of children for publicity purposes will require the consent of either the individual concerned or, in the case of pupils, their parents. This means that images should not be taken or displayed on websites, in publications or in a public place without such consent.

Staff should:

- be clear about the purpose of the activity and about what will happen to the photographs when the lesson/activity is concluded;
- use school owned, not personally owned, equipment wherever possible;
- ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose;
- ensure that all images are available for scrutiny in order to screen for acceptability;
- be able to justify images of children in their possession;
- avoid making images in one to one situations;
- not take images of pupils who are partially dressed
- store images securely and not pass them to unauthorised persons; and
- delete images after use, or archive them securely if they might be needed in the future.

When a photograph is published (e.g. on the school website) minimal additional information must be provided about the subject. This means that first names only, rather than full names, should be used and no further personal information such as addresses must be published.

### The use of personal mobile phones and cameras (this also applies to the EYFS)

The safety of children is paramount. Casual or inappropriate use of mobile phones is not allowed unless in the staffroom. However, there may be occasions when a mobile phone is needed for communication such as a school trip.

All digital images should be taken with the school cameras or similar devices and be transferred to the school network or a secure digital platform (Tapestry) as soon as possible.

### Social Contact

Staff should not establish or seek to establish social contact with pupils for the purpose of securing a friendship, or pursuing or strengthening a relationship. Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that contact could be misconstrued.

This means that staff should:

- always approve any planned social contact with a member of senior management;
- advise senior management when regular social contact occurs through activities not linked to school;
- report and record any situation which they feel might compromise the school or their own professional standing.

### Electronic communication with pupils

It is important that when staff communicate with children and young people they are mindful of their professional role. This includes the wider use of technology such as mobile phones, text messages, emails, digital cameras, videos, web-cams, websites and blogs.

Communication between children and young people, by whatever method, should take place within clear and professional boundaries.

This means that staff must:

- not give their personal contact details – e.g. mobile telephone number or personal email address – to children;
- only use equipment (e.g. mobile phones) provided by the school to communicate with children;
- only use cameras provided by the school to take photographs of children;
- avoid using personal mobile phones in the presence of children unless necessary for professional reasons;
- only make contact with children for professional reasons;
- not use the internet or web based communication channels to send personal messages to children/young people;
- be discriminating about information put into the public domain (Facebook, Myspace etc), and be mindful that such information may be seen by pupils;
- not allow children or young people to be listed as their 'friends', nor allow themselves to be listed as a 'friend' on pupils' social media sites;
- not request or respond to any personal information from a child or young person, other than that which might be appropriate as part of their professional role; and
- remember that it is the legal duty of every employee to report Safeguarding concerns and to follow the school's Safeguarding procedures.

NB

A child/young person, for purposes of this document, is a person up to the age of 18 and therefore this guidance includes contact with ex-pupils.

Email or text communication between an adult and a child/young person outside of agreed protocols may lead to disciplinary and/or criminal investigations as it could be viewed as grooming. This also includes communications made through internet sites.

Mobile phones should be in silent or off mode during working hours. Staff should only use their personal mobile phones during their breaks, in the staff room, unless they are needed for professional use on trips or outdoor PE lessons.

### Internet Use

See separate documents for Internet Policy and Responsible Internet Use.

In general:

The School has clear policies about access to and the use of the Internet. Under no circumstances should staff in school access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material, is behaviour that, if proven, will invariably result in the individual being barred from work with children and young people.

In general a person's private activities, including use of the internet, that does not involve child pornography or other illegal material, will not impinge on his or her suitability to work with children. However, using school equipment to access or store other inappropriate or indecent material, including adult pornography, will give cause for concern, particularly if as a result pupils might be exposed to inappropriate or indecent material. Staff should be aware that this would be construed as gross misconduct under the school's normal disciplinary procedures. These guidelines apply to all forms of pornography (i.e. magazines, films, DVDs etc.)

### Sexual Contact with Young People

Sexual activity may involve:

- physical contact, including penetrative or non-penetrative acts, or
- non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities,
- or encouraging children to behave in sexually inappropriate ways.

Adult behaviour may also involve 'grooming' a child. This can involve an adult conferring special attention and favour upon a child with the intent of sexually abusing them at a future point.

Staff must not pursue sexual relationships with children and young people either in or out of school. They should avoid any form of communication with a child or young person which could be misinterpreted as sexually suggestive or provocative, i.e. verbal comments, letters, notes, electronic mail, phone calls, texts (avoid use of winks/smiley faces, etc.) or physical contact. Sexual behaviour towards and/or developing a sexual relationship between a member of staff with any young person is inappropriate and illegal. This behaviour is considered as gross misconduct and will result in immediate suspension pending investigation.

### Curriculum – Relationships and Sex Education (RSE)

Staff should be aware that the SRE curriculum content includes subject matter which is sexually explicit. Care should be taken to ensure that curriculum materials cannot be misinterpreted and clearly relate to the learning outcomes identified for that lesson.

Responding to pupils' questions may require careful judgement and staff may wish to take guidance in these circumstances. Staff should not enter into or encourage inappropriate or offensive discussion about sexual activity, and care should also be taken to abide by the school's policy on sex education and the wishes of parents who have the right to withdraw their children from all or part of the SRE course provided.

### Gifts

Receiving of gifts is essentially inadvisable as it may be inappropriate and in some cases constitute a criminal offence. Of course, there are occasions when children wish to pass small tokens of appreciation to staff at Christmas time or as a thank you gift. In the context of

creating safe working practices it is also inadvisable to give or receive gifts regularly or of any value to individual young people. This could be misinterpreted by the pupil, their parents or other adults. It can be misconstrued as a gesture either to bribe, or single out the young person and it might be perceived that a 'favour' of some kind is expected in return.

This means that staff should:

- ensure that gifts received or given in situations which may be misconstrued should be declared;
- not give preferential treatment to any individual young person on a regular basis;
- ensure that any gifts given as a part of a reward system are small and an accepted part of school practice.

### Infatuation

Staff need to be aware that it is not uncommon for a pupil to develop an infatuation of a member of staff. Staff should be aware that pupils can be strongly attracted to a member of staff and may develop a heterosexual or homosexual infatuation. All situations should be responded to sensitively to maintain the dignity of all concerned. Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and for allegations to be made against staff. A member of staff who becomes aware that a pupil may have developed an infatuation (on themselves or a colleague) should discuss this at the earliest opportunity with a senior colleague so that appropriate action can be taken, where necessary.

### Dress and Appearance

It is necessary and wise for staff to consider the manner of dress and appearance appropriate to their professional role as opposed to that which may be adopted in their personal life. This means that staff should wear clothing which:

- promotes a positive and professional image;
- is appropriate to their role;
- may not be viewed as offensive, revealing, or sexually provocative;
- does not distract, cause embarrassment or give rise to misunderstanding;
- is absent of any slogans.

Staff who dress or appear in a manner which could be considered as inappropriate or offensive, could render themselves vulnerable to criticism or allegation and should expect guidance from senior staff.

### Searching

If an investigation or an allegation leads to reasonable grounds for a search of a pupil or their possessions or personal spaces (pockets, desks, bags etc.) then two staff members must be present while the search is conducted.

Pupils must be asked to empty pockets, desks and bags themselves.

Random searches are not allowed.

## **Appendix 4: Contractors' Letter**

To: All non-employees working on a contract basis at St. Helen's College

Re: Safeguarding Code of Conduct

### Introduction

The safety and security of the pupils at St. Helen's College is my highest priority. I am writing to all non-employees who work at the school to explain how we ensure that the children remain safe and secure, and to explain the measures which you must take to support us.

### Employees

All employees of the school are checked for their suitability to work with children in three ways: by interview, by references being taken up from previous employers, and by a series of pre-employment checks including an enhanced level check with the Disclosure and Barring Service (DBS). These checks inform me whether the employee has any criminal convictions, or has been deemed unsuitable to work with children.

School employees include teachers and assistant teachers, and Funtasia, office, welfare, caretaking and playground staff. All such people are DBS checked at an enhanced level. Volunteers and peripatetic music teachers are also checked, again at an enhanced level.

### Requirements of Contract Workers

It is important that certain protocols are followed, to ensure the safety and security of the children, and also to protect the interests of contract workers. False accusations, made against adults by children, can have a devastating effect on the lives of the individuals concerned.

Contractors who are engaged to work in the school at times when children are present will be required to provide evidence that proper appointment checks have been made on their staff. In addition, all contractors will be supervised while working on site if their work might bring them into contact with children.

#### Contract workers:

- are not allowed to have unsupervised access to children;
- must not touch any child, or allow any child to touch them;
- must not give gifts or treats to any child;
- must not exchange any kind of personal information (e.g. phone number) with a child;
- must not allow any close relationship to develop with an individual child or group of children.
- Must not use mobile phones in areas where children are present.

Friendly and courteous behaviour is of course appropriate, but care must be taken to ensure that the above protocols are observed.

If a contract worker finds him/herself in a position which is inappropriate, e.g. in a classroom with children with no adult present, then he or she should seek the supervising teacher immediately, and report any concerns to me.

**I have provided you with two copies of this Code of Conduct. When you have read it, please sign one copy and return it to me. The second copy is for you to keep.**

Thank you for your assistance in this important matter.

S. Drummond  
Head



Appendix 6

