

## Safeguarding (Child Protection) Policy

**Owner:** JAP  
**Reviewed:** March 2022  
**Governor Approval:** March 2022  
**Next Review:** As required (and no later than September 2022)

Lady Eleanor Holles is committed to safeguarding and acting in the best interests of children and young people and expects everyone who works in the School to share this commitment.

Through the procedures outlined in this Policy, the School is committed to acting in the best interests of any child and creating an environment where everyone who works in the School feel able to raise any concerns, and where they feel supported in their safeguarding role.

*This document can be viewed on the School's website ([www.lehs.org.uk](http://www.lehs.org.uk)) or a hard or an emailed copy can be requested from the School by contacting the Head Mistress's PA on [pahm@lehs.org.uk](mailto:pahm@lehs.org.uk).*

### Related Policies

- Anti-bullying Policies (Senior and Junior) (\*)
- Trips and Expeditions Policy (\*)
- Staff Recruitment and Selection Policy (\*)
- VMT Music Department Guidelines
- Equal Opportunities (Pupils) Policy
- LDD (including SEN) Policies (Senior and Junior) (\*)
- Policies to Promote Good Behaviour (Senior and Junior) (\*)
- Drugs and Substance Misuse Policy
- Wellbeing Policy (Senior and Junior)
- Staff Acceptable Use of IT Policy
- Data Protection Policy
- Digital Safety Policy
- PSHE (Personal, Social, Health & Economic Education) Policy (including Relationships And Sex Education (RSE)) (Junior School) (\*)
- Relationships And Sex Education (RSE) Policy (Senior School) (\*)
- Remote and Hybrid Teaching Policy (\*)
- Missing Child Policy (Senior and Junior School)

*The related policies marked (\*) can be viewed on the School's website ([www.lehs.org.uk](http://www.lehs.org.uk)), alternatively all the related polices can be requested from the School by contacting the Head Mistress's PA on [pahm@lehs.org.uk](mailto:pahm@lehs.org.uk).*

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## 1 IMPORTANT CONTACT DETAILS

### School Contact Details:

The Governors have appointed the Deputy Head (Pastoral) as the Designated Safeguarding Lead ('DSL'). Two members of staff deputise for her:

- The Head of the Junior School (whose deputy is the Deputy Head of the Junior School); and
- The Head of Sixth Form

but the ultimate lead responsibility for safeguarding and child protection (including online safety) remains with the DSL.

The DSL and/or a Deputy will always be available during School hours. One of the DSL or the Deputies will be available out of School hours. This will remain the case even if the School is required to be shut due to Covid or any other reason.

Contact details are set out below:

**Designated Safeguarding Lead ("DSL"):** Mrs Amanda Poyner,  
Deputy Head (Pastoral) (Ext 767)  
School Office: 020 8979 1601 (Ext 767)  
07525 807672  
[DeputyHeadPastoral@lehs.org.uk](mailto:DeputyHeadPastoral@lehs.org.uk)

**Deputy Designated Safeguarding Lead:** Mr M Tompsett,  
Head of Sixth Form (Ext 761)  
School Office: 020 8979 1601 (Ext 761)  
07809 343018  
[headsixth@lehs.org.uk](mailto:headsixth@lehs.org.uk)

**Deputy Designated Safeguarding Lead:** Mrs Paula Mortimer,  
Head of Junior School (Ext 750)  
School Office: 020 8979 1601 (Ext 750)  
07941 284436  
[hjd@lehs.org.uk](mailto:hjd@lehs.org.uk)

**Deputy Designated Safeguarding Lead:** Mrs Rebecca Yates,  
Deputy Head of Junior School (Ext 751)  
School Office: 020 8979 1601 (Ext 751)  
[RYates@lehs.org.uk](mailto:RYates@lehs.org.uk)

### For any allegations of abuse against a member of staff or volunteer:

**Head Mistress:** Mrs Heather Hanbury  
Head Mistress (Ext 704)  
School Office: 020 8979 1601 (Ext 704)  
[heatherhanbury@lehs.org.uk](mailto:heatherhanbury@lehs.org.uk)

**For any allegations of abuse against the Head Mistress:**

**Chair of the Governors:** Mr David King  
c/o Clerk to the Governors  
020 8783 9792  
[clerk@lehs.org.uk](mailto:clerk@lehs.org.uk)

Two Governors have been nominated as Governors with leadership responsibility for safeguarding arrangements (each a “Nominated Safeguarding Governor”) and the terms of reference for those appointments are set out in the Governors Handbook (and set out in Appendix 9 for ease of reference).

**Governors with responsibility for safeguarding:** Sister Paula Thomas  
Ms Cathy Millis  
Both: c/o Clerk to the Governors  
020 8783 9792  
[clerk@lehs.org.uk](mailto:clerk@lehs.org.uk)

**For anyone who has experienced sexual abuse in educational settings or has concerns about someone or the issues raised by Everyone’s Invited:**

Dedicated NSPCC helpline number: 0800 136 663

More information available at website: [Dedicated helpline for victims of abuse in schools NSPCC](#)

**All referrals for safeguarding issues, including those related to radicalisation, should be made to the SPA in the first instance:**

**Richmond Single Point of Access (SPA):** 020 8547 5008 8am-5.15pm (5pm on Fridays)  
(020 8770 5000 for out of hours/weekends)

**Kingston Single Point of Access (SPA):** 020 8547 5008 8am-5.15pm (5pm on Fridays)  
(020 8770 5000 for out of hours/weekends)

The new safeguarding arrangements can be found here:

[Kingston and Richmond Safeguarding Children Partnership Published Arrangements](#)

**Local Authority Designated Officer (LADO):** [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)  
(020 8891 7370)  
Gen No.: 020 8547 5008  
(020 8770 5000 for out of hours/weekends)

**Kingston and Richmond Children Safeguarding Partnership:** Elizabeth Major (Professional Advisor)  
07833 481774  
[elisabeth.major@kingrichlscb.org.uk](mailto:elisabeth.major@kingrichlscb.org.uk)  
(secure email)  
Kingston and Richmond Children Safeguarding Partnership  
42 York Street, Twickenham TW1 3BW  
tel: 0208 547 5008

Contacts of the *London Safeguarding Children's Board and Partnership Contacts* can be found [here](#) and the primary contacts in the catchment of the School's pupils are set out below for ease of reference:

Ashford/Elmbridge/Weybridge	0300 123 1610
Hounslow	020 8583 3066
Ealing	020 8825 5000
Hammersmith	07739 315 388
Kingston and Richmond	020 8831 6323
Merton	020 8545 4866
Wandsworth	020 8871 8610/7401
Surrey	0300 470 9100
Windsor and Maidenhead	01628 683150

**The Disclosure and Barring Service (DBS):** PO Box 181 Darlington DL1 9FA  
Tel: 01325 953 795

**For Prevent matters, as stated above, all referrals should be made to the SPA in the first instance, but other contact details are:**

**Non-emergency police number:** 101  
**Local Police Number:** 07879 430 704 (Hampton)  
0208 721 2748 (Teddington)

**The DfE dedicated telephone helpline and mailbox for non-emergency advice:** 020 7340 7264  
[counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

**Female Genital Mutilation:**

**Local Police Number (for reporting an act of FGM):** 07879 430 704 (Hampton)  
0208 721 2748 (Teddington)

**If a professional has concerns about FGM which they wish to discuss they can contact:** Kingston or Richmond SPA (above),  
NSPCC Child Protection Helpline on  
0808 800 5000, or  
**Seek advice from:** FORWARD on 020 8960 4000  
([support@forwarduk.org.uk](mailto:support@forwarduk.org.uk))

**In relation to Looked After Children:**

Advice and support are available from Richmond County Council's Children's Services LACs team. The Richmond website has a LAC Education section, which includes relevant guidance and strategy documents:  
[http://www.richmond.gov.uk/children\\_looked\\_after](http://www.richmond.gov.uk/children_looked_after)

**National Domestic Abuse Helpline:** 0808 2000 247

**The Department for Education COVID-19 helpline:**

Email: [DfE.coronavirushelpline@education.gov.uk](mailto:DfE.coronavirushelpline@education.gov.uk)  
Telephone: 0800 046 8687  
Lines are open Monday to Friday from 8am to 6pm and weekends 10am to 4pm.

## 2 INTRODUCTION

### 2.1 Guiding Principles

2.1.1 Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

2.1.2 This policy has regard for the guidance stated in:

- Keeping Children Safe in Education (September 2021) (Part 1 and Annex B of which is attached at Appendix 12)
- Working Together to Safeguard Children (dated July 2018, but updated subsequently)
- What to do if you're worried a child is being abused (March 2015)
- Sexual violence and sexual harassment between children in schools and colleges (September 2021)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS Education Group)
- Statutory Guidance: Relationships Education, Relationships and Sex Education (RSE) and Health Education
- Prevent Duty Guidance for England and Wales
- Charity Commission's Strategy for Dealing with Safeguarding Issues in Charities
- Government Guidance regarding school operations during Covid including Guidance on safeguarding and remote education during coronavirus (COVID-19) as updated from time to time.

2.1.3 The School recognises it has a pivotal role to play in multi-agency safeguarding arrangements. The School (with the DSL as the primary point of contact) works constructively with and contributes to multi-agency working at Kingston and Richmond Children Safeguarding Partnership but also in all other relevant areas where the School's pupils reside.

2.1.4 The School is also guided by the Children Act 1989, Section 1, which replaces the notion of parental rights with parental responsibility and demands that the child's welfare be paramount in all procedures concerning child abuse. The School is aware of the consequences for children, when they are abused, exploited or neglected.

2.1.5 The School recognises several key issues which it wishes to address including:

- The willingness to believe that child protection issues can arise anywhere, both inside and outside School.
- The School's part in the wider safeguarding system and working with other parties to consider, at all times, what is in the best interests of the child.
- The importance of early help and careful listening.
- No single professional can have a full picture of a child's needs and circumstances. If children are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Safeguarding and promoting the welfare of children is everyone's responsibility.

- Where there is a safeguarding concern, ensuring the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide.
- All systems in place should be easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

## **2.2 Covid-19**

- 2.2.1 LEH is committed to safeguarding and promoting the welfare of children particularly throughout this difficult period brought about by the COVID-19 outbreak. The principles and practices of the School's Safeguarding (Child Protection) Policy and other related policies and procedures continue to apply in full.
- 2.2.2 All staff and in particular the DSL Team are very aware that pupils may require additional support due to the pandemic arising out of anxiety, having suffered bereavements and potentially having new safeguarding and welfare concerns. Staff are aware of the signs to look out for and the processes to report any concerns and the DSL Team, supported by the counsellors and nurses are providing additional support. Whilst the Safeguarding (Child Protection) Policy Addendum introduced when schools were shut due to Covid will not apply whilst the School is open it will be updated and re-introduced in the event of any partial or full closure of the School at any date in the future. In the meantime, the School has introduced new measures to deal with remote/hybrid teaching during the ongoing Covid-19 pandemic (see Paragraph 2.4.3 below).

## **2.3 Staff**

- 2.3.1 All staff are issued with the Safeguarding (Child Protection) Policy, and they are required to confirm that they have read and understood such Policy on starting employment at the School.
- 2.3.2 This Policy includes the Code of Conduct for Working with Children and Young Adults at Appendix 4 and sets out the professional responsibilities of all staff with regard to their relationship with pupils and it is expected all staff will be familiar with its terms and adhere to them at all times.
- 2.3.3 Staff will meet with the DSL on induction (or shortly thereafter) to ensure that they are fully briefed on her role and their role and responsibilities regarding implementing safeguarding and child protection within the School. Staff are regularly trained (as set out in Part 5 of this Policy) in order to keep them up to date and reinforce their role in this regard.

## **2.4 Educating and Supporting Pupils**

- 2.4.1 The School is committed to ensuring that pupils are taught about safeguarding and how to stay safe, both in and out of School and online. This is delivered through the curriculum and in particular the PSHE programme (e.g. bullying, e-safety, personal safety) through Relationships and Sex Education (which has been updated in both the Senior and Junior Schools following the introduction of the new statutory guidance in 2020), and via other methods, which may include assemblies and information notices.
- 2.4.2 The School has identified that use of IT and the internet presents risks to the pupils and that abuse can take place concurrently via online channels and in daily life. It is acknowledged that children can abuse their peers online and this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent

images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. The School's Digital Safety Policy sets out the support and education provided to staff, pupils and parents in this regard and what protections are in place on a technical level. The School also implements its Acceptable Use of IT Policy for Pupils (Senior and Junior) and Staff Acceptable Use of IT Policy which sets out requirements for pupil and staff use of IT in School.

The school is aware that education on digital safety is essential, as many children may now have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), which some of them may abuse to sexually harass their peers, share indecent images consensually and non-consensually and view and share pornography and other harmful content. Whilst in school and using the LEHS wifi, such content is blocked by our filtering system.

- 2.4.3 Whilst schools were shut due to Covid the School taught remotely adhering to all Government Guidance and safeguarding principles as set out in the Covid-19 Safeguarding (Child Protection) Policy Addendum introduced at that time. Whilst the Addendum has subsequently been withdrawn, it is recognised some remote/hybrid teaching may continue to be required going forward and the School has a Covid-19 teaching protocol (to determine the approach to remote/hybrid teaching according to both pupils and teachers having to be at home during the pandemic). It has also introduced a Remote and Hybrid Teaching Policy which incorporates the safeguarding arrangements for the safety of pupils while using online learning, previously incorporated in the Addendum, and updated to deal with new potential of hybrid teaching (teachers/pupils being at home and school).
- 2.4.4 The School operates a very open culture encouraging pupils to raise and discuss issues and concerns, in particular regarding all safeguarding matters. There are two School counsellors for the Senior School and one counsellor for the Junior School. In addition, the School Council offers an opportunity to the pupils to raise concerns and it encourages dialogue at all levels, with full access to the Head Mistress.

## **2.5 Parents**

If parents should become concerned either about their own child or children, or another pupil or pupils at the School, they should contact the DSL. Should the concern relate to the DSL, the Head Mistress should be contacted. The School offers periodic support for parents e.g. in offering talks from outside agencies or sharing useful resources regarding internet and social media use on the Parent Portal.

## **2.6 Volunteers, Contractors etc.**

- 2.6.1 **Volunteers:** By prior arrangement, volunteers are allowed to participate in School events. Volunteers will normally be persons known to the School e.g. a parent or friend/relative of a member of staff. Where such arrangements do not amount to the individual being in regulated activity the School will undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate. Where the arrangement is of a more regular, frequent or overnight nature the School will follow safer recruitment practices. The School will follow safer recruitment practices, as outlined in the School's Staff Recruitment and Selection Policy regarding each type of volunteer.

2.6.2 **Contractors:** Contractors are on site from time to time (some on a regular basis and others for emergency/ad hoc work). The School will follow safer recruitment practices, as outlined in the School's Staff Recruitment and Selection Policy regarding each type of contractor.

2.6.3 **Lets:** Where the School hires out its facilities to organisations or individuals, they ensure that appropriate arrangements are in place to keep children safe.

## 2.7 Safe Recruitment

To ensure the protection of children in its care, the School complies with the provisions in 'Keeping Children Safe in Education' (2021) and the Independent Schools' Regulatory Requirements. The School operates safe recruitment procedures as set out in the School's Staff Recruitment and Selection Policy which includes procedures to comply with the statutory guidance: "Disqualification under the Childcare Act 2006". The School seeks written assurance that appropriate child protection checks and procedures apply to any staff employed by any alternative provision provider.

## 2.8 Children with Special Educational Needs & Disabilities or physical health issues

- 2.8.1 The School recognises that children with special educational needs or disabilities or certain health conditions can face additional safeguarding challenges. They may struggle to communicate the problems and be disproportionately affected by the issues such as peer group isolation, peer on peer abuse or bullying (including prejudice-based bullying) and it may be more difficult to spot the indicators of possible abuse etc. Staff are assisted by the learning support and pastoral teams in supporting such children accordingly.

2.8.2 The School identifies those pupils that may face additional challenges and provides extra support for those pupils through the pastoral system.

## 2.9 Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. For more details on information sharing, see paragraph 4.3.9 below.

## 2.10 Whistleblowing

2.10.1 The School is committed to safeguarding and the implementation of this policy, but if staff or volunteers have any concerns at any time about poor or unsafe practice, or potential failures in the School's safeguarding regime, they should, in the first instance, raise their concerns with the DSL or the Head Mistress. The DSL, Head Mistress (and indeed the whole Senior Management Team) will take seriously any such concerns.

2.10.2 If the member of staff or volunteer feels unable to raise the issue with either of them or feels that their genuine concerns are not being addressed, they should, through the Clerk to the Governors (clerk@lehs.org.uk), and without informing the Head Mistress first, immediately inform the Chair of Governors.

2.10.3 Alternatively, if a member of staff feels unable to raise an issue through either of these channels or feels that their concerns are not being addressed, the following other whistleblowing channels are available:

Contacting either SPA and/or LADO (contact details as set out in Part 1 of this Policy)

NSPCC whistleblowing helpline: 0800 028 0285

NSPCC email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

NSPCC address: NSPCC Weston House 42 Curtain Road London EC2A 3NH

- 2.10.4 Furthermore, it should be stressed that anybody can make a referral at any time and the contact details are set out in Part 1 of this Policy. This may be particularly appropriate in the event of a genuine concern that appropriate action has not been taken (See Paragraph 4.3.5. below).
- 2.10.1 The person in School who received the concern shall keep the complainant updated regarding their concerns and confirming their conclusions and any actions required.

### **3 TYPES AND SIGNS OF ABUSE AND OTHER SAFEGUARDING RISKS**

#### **3.1 Overview**

- 3.1.1 Child abuse and other safeguarding issues of all kinds: physical, sexual, emotional, neglect, female genital mutilation and child sexual exploitation has been increasingly detected and brought to the attention of the general public in recent years. An additional dimension involves the use of the internet, other electronic media and social networking sites, where pupils of any age can be made vulnerable through misuse, by themselves or others. They are rarely standalone events or issues and, in most cases, multiple issues will overlap with each other. The effects may be serious and long term.
- 3.1.2 Many child abusers are known to the victim either as relatives or as friends of the family or as part of an institutional or community setting. Some, children meet in other contexts e.g. via the internet. A small minority of these may gain access to children in schools as teachers, ancillary workers, and volunteers or through their employment in some capacity relating to school activities.
- 3.1.3 Staff must take special care to help safeguard and promote the welfare of children and young people who may be living in particularly stressful circumstances, recognising that this may increase their vulnerability. These include families living in poverty or where a parent/carer is misusing drugs or alcohol. Staff must remain vigilant of the factors set out at 4.1.1. Safeguarding incidents and/or behaviours can be associated with factors outside School and/or can occur between children outside the School. All staff should consider whether pupils are at risk of abuse or exploitation in situations outside their families when incidents and/or behaviours occur, and staff should provide as much information as possible in this regard as part of any referral.
- 3.1.4 Types and signs of abuse of which staff should be aware are detailed at Appendix 1 of this Policy. If staff are unsure, they should always speak to the DSL or a Deputy.

#### **3.2 Pupils who run away or go missing**

- 3.2.1 The School is aware that going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, child sexual and criminal exploitation, and early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker.
- 3.2.2 The School monitors School attendance rigorously. Any unexplained absence is followed-up without delay (and in that regard, where reasonably possible, the School holds more than one emergency contact number for each pupil in order to have additional options

to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern) and will, where deemed necessary, be reported to Social Services and/or the Police.

### **3.3 Mental Health**

- 3.3.1 Staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and to identify those pupils whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 3.3.2 If a member of staff has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following this Policy and speaking to the DSL or a Deputy.
- 3.3.3 The School has specifically identified that mental health issues present a risk to its pupils and has put in place numerous safeguards in addition to this Policy (see policies listed in Related Policies above, particularly the Wellbeing Policies (Senior and Junior)) to protect pupils from such risks and provide support to them should any issues arise.

### **3.4 Risk of radicalisation**

- 3.4.1 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 also includes calls for the death of members of our armed forces, whether in this country or overseas.
- 3.4.2 The School takes seriously its duty to ensure that its pupils are safeguarded from being drawn into extremism or terrorism. This policy has regard to the Home Office guidance 'Prevent Duty Guidance', "The Prevent Duty: Departmental Advice for Schools and Childcare Providers" and "The use of social media for on-line radicalisation". The DSL and Governors have responsibility for overseeing and implementing Prevent requirements which it shall undertake to do as set out in the following paragraphs:-
- 3.4.3 Risk assessment
  - The School, under the guidance of the DSL, assesses the general level of risk of pupils being radicalised or drawn into terrorist/extremist activity (see Appendix 5 for some indicators) on at least an annual basis.
  - The Designated Safeguarding Lead will work with the Heads of the Junior, Middle, Upper Schools and Sixth Form to identify specific pupils who may be at particular risk.
- 3.4.4 Visiting Speaker Protocol

The School has a protocol regarding visiting speakers so that:

  - A Visiting Speaker Form is completed (see Appendix 11) and submitted together with the Dates Approval Form in advance of their visit to the School.
  - The DSL assesses the level of risk of pupils being exposed to radical/extreme views either by the speaker(s) or the content of their speech.
  - If it is concluded a risk exists, then the DSL undertakes the risk assessment in the form attached to the Visiting Speaker Form. Where possible speakers will be booked as a result of recommendations, or testimonials which can be checked.
  - The DSL shall ensure all checks undertaken (if applicable) are recorded in the Single Central Register.
  - All visiting speakers are accompanied by a member of staff at all times.

#### 3.4.5 Procedures

- If a member of staff, pupil or parent has any concerns about the potential radicalisation of a pupil, they should follow the School's usual safeguarding procedure as laid out in this Policy.
- The School will work closely with parents to support them when a risk of radicalisation is identified.

#### 3.4.6 Training

- All staff are required to read this Policy (as updated from time to time) which includes the signs of radicalisation.
- All staff and Governors undertake the online training module on Channel General Awareness issued by the College of Policing and Metropolitan Police Service.

#### 3.4.7 Building Resilience to Radicalisation

- Fundamental British Values are embedded in the School's PSHE programme and other aspects of the School's SMSC education including assemblies.
- Cross-curricular links in subjects such as history, geography and Religious Studies highlight the diversity of faith and experience in Britain and the wider world.
- The School has a wide range of extracurricular activities which promote debate of contentious issues such as MUN, Current Affairs Club, public speaking and debating which require pupils to consider democracy and diversity and to encourage an atmosphere of mutual respect.
- The DSL will liaise with the Director of Studies to ensure that all relevant aspects of the School's curriculum support pupils in developing the ability to resist pressure and make safer choices, knowing where to seek help if necessary.

#### 3.4.8 IT Policies and Training

- All work undertaken by the School in relation to educating pupils on e-safety and applying internet filters etc. will take into account radicalisation and the part IT has to play in this risk.
- Training for staff will also include an understanding of how the internet, in particular social media, is used to draw young people into extremism.

#### 3.4.9 Working in Partnership

- The DSL liaises regularly with the Kingston & Richmond Safeguarding Children Partnership regarding their advice on the general level of risk to its pupils and for developing practice in School.
- The School is a member of the local Independent Schools Safeguarding Board and uses this forum as an opportunity to share best practice with other local schools.

### 3.5 Looked After Children (and previously Looked After Children)

In the case of children who are looked after by a local authority (or have previously been looked after), the School will ensure that staff have the skills, knowledge and understanding necessary to keep them safe. This will include ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers, and information available to the Designated Safeguarding Lead, and/or her Deputies. More details of the School's

arrangements in respect of looked after children (or who have previously been looked after) are set out in Appendix 7.

### 3.6 Peer on Peer Abuse (child on child)

3.6.1 All staff should be aware that children can abuse other children (peer on peer abuse). It can happen both inside and outside of School and online. Even if there are no reports in School it does not mean it is not happening, it may be the case that it is just not being reported. Peer on peer abuse is most likely to include, but is not limited to:

- bullying (including cyber-bullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and seminude images and/or videos (also known as sexting or youth produced sexual imagery) (see 3.7 below);
- upskirting, usually involving taking a picture under a person's clothing without their permission, to obtain sexual gratification or cause the victim humiliation, distress or alarm; anyone of any gender, can be a victim;
- initiating/hazing type violence and rituals.

It is recognised it is more likely that girls will be victims and boys perpetrators but not necessarily in all cases and all peer-on-peer abuse is unacceptable and will be taken seriously.

3.6.2 The School minimises the risk of peer-on-peer abuse by educating children about the nature and prevalence of peer or peer abuse via PSHE and in the wider curriculum covering topics such as understanding bullying, and specifically cyberbullying. Pupils are frequently told reminded what to do if they witness or experience such abuse, the effect it can have on those who experience it and the possible reasons for it.

3.6.3 The School has a zero-tolerance approach towards all peer on peer abuse which is made clear to all pupils. All peer-on-peer abuse, irrespective of the gender of the perpetrator or victim, is unacceptable and will be taken seriously. Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

3.6.4 In the case of any concerns or allegations of abuse by **one or more pupils** (or peer at another school or outside School) against another pupil (or peer at another school) the member of staff to whom the allegation is made, or who has suspicions, should report the matter immediately to the DSL, or in her absence to one of her Deputies either in person or, and in any event, using the LEH Safeguarding Report Form (See paragraph 4.2.2). Detailed procedures in the event of a reports of sexual violence and sexual harassment are set out in Appendix 3.

3.6.5 All children involved (perpetrator and victim) will be treated as “at risk”. Through the pastoral system, support will be given to victims of peer-on-peer abuse, the perpetrator,

and any other child affected as deemed necessary. This may include a recommendation to see the School counsellor or contact with external agencies as appropriate. The School will make a referral via SPA as applicable in the same way and within the same timescale as other referrals. Parental consent is not required for any statutory referral.

### **3.7 Youth Produced Sexual Imagery (Sexting)**

- 3.7.1 Youth produced sexual imagery is a distinct element of what is often termed ‘sexting’. The wider term might include the writing and sharing of explicit messages with people they know. The more specific term refers to an act which involves a child or young person under the age of 18 sharing images that they, or another child, have created of themselves. This can include both still photos and moving videos.
- 3.7.2 Under the Sexual Offences Act 2003 it is an offence to possess, distribute, show and make indecent images of children. Therefore, pupils who are involved in youth produced sexual imagery may be committing an illegal act. However, the most recent guidance recommends that in incidents where a child creates and shares sexual imagery of themselves with a peer (also under 18), a child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult, or a child is in possession of sexual imagery created by another child, this should be treated as a safeguarding issue rather than criminalising the child or children involved.
- 3.7.3 Any disclosure of such an incident, or concern that such an incident has taken place, should be referred to the DSL using the procedures detailed in Section 4 below. The DSL will follow the advice given in the UKCCIS guidance in consulting the relevant members of the pastoral team, interviewing the child involved, communicating with parents and making a referral to the police or children’s social care (via the SPA) if there is concern about the risk of harm to the child involved.
- 3.7.4 It is the responsibility of the DSL to ensure that the pastoral team and wider School staff have relevant training in how to recognise and handle disclosures of incidents involving youth produced sexual imagery. In particular, as far as possible staff should not view the images themselves as they may commit a further criminal offence in doing so. Immediate referral to the DSL is the best course of action.

### **3.8 Sexual Violence and Sexual Harassment**

- 3.8.1 Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 3.8.2 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally).
- 3.8.3 Staff are aware that it is never acceptable and that it is vitally important that **all** victims are taken seriously and offered appropriate support. Detailed procedures in the event of a reports of sexual violence and sexual harassment are set out in Appendix 3.

### **3.9 Other Safeguarding Issues**

- 3.9.1 Other safeguarding issues may arise, including: bullying, domestic violence, drugs, truancy, homelessness, fabricated or induced illness, forced marriage, gangs and youth

violence, being involved in serious violence and violent crime, gender-based violence, hate and relationship abuse, child abduction and community safety incidents.

3.9.2 The School has policies to specifically address bullying including cyber bullying and the risks of alcohol and drugs. See Related Policies above.

3.9.3 Annex B of KCSIE sets out additional information about specific forms of abuse and safeguarding issues (and there is a link to this at Appendix 12). This includes:

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- So-called “honour-based” abuse (including Female Genital Mutilation and Forced Marriage)
- FGM
- Preventing Radicalisation
- The Prevent Duty
- Channel
- Additional Support
- Peer on peer abuse / child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment.

## 4 PROCEDURES

### 4.1 Introduction

4.1.1 The School acknowledges the importance of children receiving the right help at the right time in order to address safeguarding risks, prevent issues escalating and to promote children's welfare. Staff should be particularly alert to the potential need for early help for any child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a social worker;
- requires mental health support;
- is a looked after child or was a previously looked after child;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or forced marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

4.1.2 Safeguarding concerns may take a number of different forms, including:

- A disclosure from a pupil;
- Concern that a child is in need;
- Concern that a child is suffering, or likely to suffer, harm;
- Concern that a child is in need and early help may be required to support the pupil or her family.

4.1.3 In cases where a disclosure is made by a pupil to a member of staff:

- No leading questions should be asked ('TED' questions should be used: Tell, Explain, Describe').
- This information should be recorded in written form either contemporaneously or as quickly as possible after the disclosure was made.
- Pupils must not be offered confidentiality and should be informed to whom the information they have disclosed will be passed on. Confidentiality should, however, continue to be maintained between those professionals (DSL/social care etc.) who need to be informed, and a pupil can be reassured this will be the case.
- Staff should recognise that a child is likely to disclose to someone they trust: this could be anyone in the School and it important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- The information should then be passed to the DSL, or in her absence either of her Deputies, without any delay.

4.1.4 All staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

## 4.2 Concerns about a child

4.2.1 If staff have **any concerns** about a child's welfare, they should act on them immediately. Early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Staff should not assume a colleague or another professional will take action and they should share information that might be critical in keeping children safe.

4.2.2 In the first instance (save as when there is an allegation of abuse made against a member of staff/Governor/volunteer in which case Paragraph 4.5 below shall apply) any safeguarding **concerns** about a pupil should be referred to the Designated Safeguarding Lead, or, in her absence, either of her Deputies who then can decide the next steps. Whilst an initial report can be made verbally, any report shall be followed up by using the LEH Safeguarding Concern Form (available on the iLP or in hard copy available from the School Office or the Staff Room; see Appendix 10) or by making a report on CPOMs. They will need to decide what action to take, and options include: managing the support of the pupil through the School's pastoral system, an early help assessment or a referral.

4.2.3 If early help is appropriate, the DSL (or a Deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

4.2.4 If a child is **suffering or is likely to suffer from harm** a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where such referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. The School will provide as much information as possible as part of the referral process.

4.2.5 When there is an immediate need to protect the child, the police should be called on 999.

4.2.6 The DSL or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, none of them are available then this should not delay appropriate action being taken and staff should consider speaking to the Headmistress or any other member of the Senior Management Team and/or take advice from local children's social care (contact details at the start of this Policy). In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

## 4.3 Making a referral and sharing information

4.3.1 The School acknowledges the importance of pupils receiving the right help at the right time to address any risks and prevent issues escalating. Therefore, in deciding whether to make a referral, the DSL, will not make her own decision over what appear to be borderline cases, but will discuss the issues with the LADO or SPA in the first instance. The DSL will always refer to the relevant multi-agency threshold document (according to which area the pupil lives) in her consideration of next steps. The School will do nothing

to jeopardise a police investigation (such as asking the child leading questions or attempting to investigate the allegations of abuse).

- 4.3.2 The School will communicate readily with the local safeguarding agency via the Single Point of Access Team (SPA) whenever an allegation or disclosure of abuse has been made or with the LADO in case of allegations involving members of staff. Such calls to them will be made to them within 24 hours of the allegation or disclosure. The advice from the SPA will always be followed by the School, including any actions requested by them including making a referral.
- 4.3.3 Where a referral is not made, the School will act on the guidance of the relevant safeguarding body and will reassess the situation should the situation not improve. The School is committed to challenging inaction.
- 4.3.4 It is the School's policy that referrals to Social Services (whether it be because of a disclosure of abuse, because there is concern that a child may be at risk, or where there is concern that additional intervention may be required to support the pupil or her family) are ordinarily made by staff with designated responsibility in this area: the Designated Safeguarding Lead, or, in her absence, either of her Deputies.
- 4.3.5 However, all staff are aware of the process for making referrals to children's social services and it should be stressed that anybody can make a referral at any time and the contact details are set out in Part 1 of this Policy. The School asks that staff inform the DSL or, in her absence, either of her Deputies immediately when a referral has been made.
- 4.3.6 Following a referral, the local authority should make a decision within one working day, about the type of response that is required, and if they do not inform the School, the referrer should follow this up and where concerns persist, the School will continue to share these with the relevant agency, reassessing as necessary. The School is committed to challenging inaction. If social workers decide to carry out a statutory assessment, staff will do everything they can to support that assessment (supported by the DSL (or Deputies) as required).
- 4.3.7 Where it is appropriate, and under the direction of Social Services, the views of the child involved will be sought and considered.
- 4.3.8 In the case of pupils identified as being at risk or radicalisation, there may be a referral to the local police Channel contact.
- 4.3.9 The School has regard to the Government's advice in "Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers". When making a referral staff must be aware of rules surrounding the sharing of information pursuant to the Data Protection Act 2018 and General Data Protection Regulation (GDPR), including identifying special category data and conditions permitting information to be stored or shared. If in any doubt about sharing information, staff should speak to the DSL or a Deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

#### 4.4 Child in Need

- 4.4.1 When it is considered that a child is in need and additional support is required (to support the pupil or her family), as opposed to when it is considered that a child is suffering or is likely to suffer harm, this will lead to the School using agreed local inter-agency

processes, including the use of the “Early Help Assessment” (EHA) to facilitate coordinated multi-agency support. This may result in ‘Team Around the Child’ (TAC) meetings.

4.4.2 Where parental consent for an Early Help Assessment is not given, or offered support is refused, and this leads to a child being at risk of suffering or likely to suffer significant harm, then the matter will be dealt with pursuant to Paragraph 4.2.4.

#### **4.5 Concerns About Behaviour and/or Allegations of Abuse Made Against Staff (including supply staff, Volunteers, Governors and contractors)**

4.5.1 A safeguarding concern or an allegation against a member of staff (including the Designated Safeguarding Lead, supply staff, volunteer, Governor or contractor, including the Chair of the Governors) posing a risk of harm to children is to be reported immediately to the Head Mistress, or in her absence passed to the Chairman of Governors, through the Clerk to the Governors.

4.5.2 If the concern/allegation concerns the Head Mistress, the person receiving the allegation, should, through the Clerk to the Governors, and without informing the Head Mistress first, immediately inform the Chair of Governors, or in their absence one of the Nominated Safeguarding Governors. Where there is a conflict of interest in reporting the matter to the Head Mistress, the matter should be reported directly to the LADO.

4.5.3 This part of the Policy is about managing allegations that might indicate a person would pose a risk of harm if they continued to work in their present position or in any capacity with children in the School and it is to be used in respect of all cases in which, it is alleged that a teacher, or other member of staff or supply staff or Governor or volunteer or contractor has:

- behaved in a way that has harmed a child or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that might have happened outside of School that might make an individual unsuitable to work with children.

4.5.4 The detailed procedures to be followed in the event of any allegation against a member of staff, supply staff, volunteer, contractor or Governor are set out in Appendix 2.

4.5.5 It is essential that any allegation of abuse made against a member of staff, supply staff, volunteer, contractor or Governor is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. The quick resolution of the allegation should be the clear priority, and unnecessary delays should be eradicated.

4.5.6 This policy relates to members of staff, supply staff, governors, contractors and volunteers who are currently working in the School, regardless of whether the School is where the alleged abuse took place. Allegations against a member of staff, supply staff Governor, contractor or volunteer who is no longer teaching or otherwise at the School (and historical allegations) will be referred to the police.

#### **4.6 Records**

4.6.1 All concerns, records of discussions/meetings/communications and decisions made and reasons for those decisions are recorded in writing. Any initial concern will be made on

the LEH Safeguarding Concern Report Form, available on the iLP and from the Staff Room and School Office (and attached to this Policy at Appendix 10) or via CPOMS. The DSL will provide guidance on requirements as required.

4.6.2 A summary of anonymised cases of safeguarding concerns (whether or not they are referred) is recorded in a central file kept securely on the School's network. Written details of such cases are kept securely by the DSL in her office or on CPOMS. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Access to these safeguarding records is in accordance with specific protocols relating to the creation, storage and access to these records and in the main, restricted to the Head Mistress and the DSL and as required, her Deputies, and to the Nominated Safeguarding Governor(s) authorised to carry out the Annual Review on behalf of the Governors.

4.6.3 The DSL reviews cases on a regular basis in order to establish if there are any concerning patterns of behaviour.

#### **4.7 Monitoring and reassessing concerns**

4.7.1 Where the advice is that situations should be monitored, cases will be reassessed by the School and, where necessary, additional guidance will be sought, or a further referral made.

4.7.2 The School will professionally raise concerns and escalate those concerns with other agencies, using the relevant Children Safeguarding Partnership Escalation Policy, where this is believed to be in the best interest of the child.

#### **4.8 Arrangements for reviewing policies and procedures**

4.8.1 The School's safeguarding and child protection policies will be reviewed annually (and earlier as required e.g. by the introduction of revised statute or statutory guidance and/or the introduction of a change in practice) by the Designated Safeguarding Lead, and the Nominated Safeguarding Governors. Any changes shall be approved by the Governing Body. Furthermore, the Nominated Safeguarding Governors shall ensure that the DSL provides an annual report to the Governing Body on safeguarding and child protection issues at the meeting in the Summer Term (the "Annual Safeguarding Review") for discussion by the Board. Such Review shall contain the detail required by the Terms of Reference of the Annual Safeguarding Review (as set out in Appendix 8). The Terms of Reference are reviewed (amended as appropriate) and approved by the Board of Governors in March each year. The minutes of the meeting receiving the Annual Review should be sufficiently detailed to demonstrate the depth of the review by the Board and that any amendments to child protection policies as recommended are approved (together with any changes that are required following the discussion in the course of the meeting).

4.8.2 Furthermore, should any deficiencies or weaknesses in child protection arrangements occur, they will be remedied without delay as and when they become apparent.

#### **4.9 Police**

In the event that the School considers at any time that a crime has, or may have been, committed, it will report the matter to the Police.

### **5 TRAINING**

- 5.1 All staff undertake the online “Awareness of Child Abuse and Neglect Course” (unless the individual can produce a valid certificate proving they have undertaken Level 2 training by a Safeguarding Children Partnership approved provider within two years prior to starting work at the School).
- 5.2 In addition, all members of staff, full or part-time will undertake training every three years (Level 2, on the advice of Kingston and Richmond Safeguarding Children Partnership). Such training includes training regarding on-line safety and Prevent. This is arranged by the Designated Safeguarding Lead.
- 5.3 The Designated Safeguarding Lead and her Deputies will undertake training in accordance with the job descriptions for these roles as found in Appendix 6 of this Policy.
- 5.4 All new members of staff receive induction training that includes:
- the School’s **Safeguarding (Child Protection) Policy**, which incorporates:
    - (1) information about the identity and roles of the DSL and the Deputies;
    - (2) the Code of Conduct for Working with Children and Young Adults (Appendix 4);
    - (3) whistleblowing procedures for safeguarding (See Paragraph 2.10 of the Policy);
    - (4) a copy of Part 1 and Annex B of ‘Keeping Children Safe in Education’ (September 2021) (Appendix 12); and
    - (5) the safeguarding response to children who go missing from education;
  - the School’s **Policies to Promote Good Behaviour (Senior and Junior)**;
  - the School’s **Anti-Bullying Policies (Senior and Junior)**;
  - the School’s **Digital Safety Policy**;
  - the **Staff Acceptable Use of IT Policy** (which staff are required to confirm they have read before they first log onto the LEH IT system and at the start of each academic year);
- and copies of all documents in bold are provided to staff.
- 5.5 All staff receive an annual update at the start of each academic year on safeguarding and child protection (including Prevent and online safety). Further updates are provided during the course of the year as required (e.g. following updates in KCSIE) in order to provide them with the skills and knowledge to implement this Policy effectively and safeguard pupils accordingly.
- 5.6 In accordance with other child protection policies, training will be provided as required to understand the needs of pupils (e.g. those with special educational needs or LGBT pupils).
- 5.7 It is recognised that staff gain a lot of knowledge and learnings through their roles and feedback on this Policy and other child protection policies is welcomed in order to regularly revise and improve the procedures accordingly. In particular, staff are asked to provide feedback on each occasion they are required to confirm they have read and understood KCSIE.
- 5.8 Regular volunteers are required to sign to confirm that they have read and that they understand both this Policy and Part 1 of KCSIE on an annual basis.
- 5.9 Governors undertake the online “Awareness of Child Abuse and Neglect Course” prior to commencing their roles (and every three years thereafter). Furthermore, they read and review this Policy as part of the Annual Review (and any intervening updates) (see 4.8.1). The Chair of Governors and the Nominated Safeguarding Governors undertake Level 3 training.

## 6 THE ROLE OF THE GOVERNING BODY

6.1 The Governing Body recognise their statutory duty under The Education (Independent Schools Standards) (England) Regulations 2014 (and in particular the following statutory guidance: Keeping Children Safe in Education (September 2021) and Working Together to Safeguard Children (July 2018) to safeguard and promote the welfare of children who are pupils at the School.

6.2 As such, the Governing Body will ensure that:

- An appropriate senior member of staff from the School's senior management team is appointed to the role of DSL.
- The School has appropriate policies and procedures in place in order to for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- The School's child protection policies shall be in accordance with locally agreed inter-agency procedures (and dealing with, amongst other things, online safety and consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)).
- The School has a code of conduct for working with children and young adults.
- The School operates safe recruitment procedures, all staff undergo safeguarding and child protection training (including online safety) at induction and such training is regularly updated.
- The School has procedures for dealing with allegations of abuse against staff, volunteers, Governors, the Head Mistress, and the DSL.
- The School has in place appropriate responses to children who go missing from education including that, where reasonably possible, the School holds more than one emergency contact number for each pupil.
- The Designated Safeguarding Lead and her Deputies have lead responsibility for child protection issues and they receive training in accordance with Part 5 of this Policy. All other staff and those working with children, including the Head Mistress, shall undertake training as set out in Part 5 of this Policy. Any deficiencies or weaknesses in child protection arrangements are remedied without delay.
- The child protection policies and procedures, and the efficiency with which the related duties have been discharged, are reviewed on an annual basis (and as set out in Part 4 above).
- Any information the School holds will be passed to the Disclosure and Barring Service when requested.
- Staff will have the skills, knowledge and understanding necessary to keep children who are looked after by a local authority safe. This will include ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers, and information available to the Designated Safeguarding Lead, and/or her Deputies.
- Pupils at the School will be taught about safeguarding (including online safety).

6.3 Whilst being mindful that safeguarding duties remain the responsibility of the Governing Body as a whole, at any time two Governors are appointed as the Governors with leadership responsibility for safeguarding arrangements (including those for Looked After Children and Prevent), the Nominated Safeguarding Governors. The role and duties of the Nominated Safeguarding Governors are set out in Appendix 9.

6.4 The Governing Body is required to report serious incidents promptly to the Charity Commission. In brief, a serious incident includes an adverse event, whether actual or alleged, which results in or risks significant: harm to the charity's beneficiaries, staff, volunteers or others who come into contact with the charity through its work; and harm to the charity's work or reputation. The Governors should report an actual or alleged

incident as soon as is reasonably possible after it happens, or immediately after they become aware of it. The report is required even if the matter has already been reported to the police or other regulator. The Charity Commission has detailed guidance on reporting requirements should the issue arise.

## Appendix 1: Types and Signs of Abuse

Recognising child abuse is not easy. It is not your responsibility to decide whether or not child abuse has taken place or if a child is at risk of harm from someone. All staff and volunteers do, however, have both a responsibility and duty to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

**One definition of 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

Child abuse may be suspected if any one or more of the following factors set out in this Appendix 2 are evident. It should, however, be noted that there may be other factors that are not included in this list, and anyone who has any cause for concern should consult with the Designated Safeguarding Lead or in her absence either of her Deputies.

The following information at paragraphs 1 - 4 below should help you to be more alert to the types and signs of possible abuse. This is taken directly from the NSPCC ('The definitions and signs of child abuse' 2010).

### 1 Physical abuse

1.1 Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries should always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

1.2 Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern, although this can be more complicated with burns, as these are often delayed in presentation due to blistering taking place sometime later.

1.3 The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks
- multiple burns with a clearly demarcated edge

1.4 Changes in behaviour that can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched

- reluctance to get changed, for example in hot weather
- depression
- withdrawn behaviour
- running away from home

## **2 Emotional abuse**

2.1 Emotional abuse can be difficult to measure, as there are often no outward physical signs. There may be a developmental delay due to a failure to thrive and grow, although this will usually only be evident if the child puts on weight in other circumstances, for example when hospitalised or away from their parents' care. Even so, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children.

2.2 Changes in behaviour which can indicate emotional abuse include:

- neurotic behaviour e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- sudden speech disorders
- self-harm
- fear of parent being approached regarding their behaviour
- developmental delay in terms of emotional progress
- bullying and/or aggressive behaviour

## **3 Sexual abuse**

3.1 Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Usually, in cases of sexual abuse it is the child's behaviour that may cause you to become concerned, although physical signs can also be present. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

3.2 It is also important to remember that it is not just adult men who sexually abuse children - there are increasing numbers of allegations of sexual abuse of children against women. Sexual abuse of children can also be perpetrated by other children (see Appendix 3). Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

3.3 The physical signs of sexual abuse may include:

- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

3.4 Changes in behaviour which can also indicate sexual abuse include:

- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- sexual knowledge which is beyond their age, or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

#### **4 Neglect**

4.1 Neglect can be a difficult form of abuse to recognise yet have some of the most lasting and damaging effects on children.

4.2 The physical signs of neglect may include:

- constant hunger, sometimes stealing food from other children
- constantly dirty or ‘smelly’
- loss of weight, or being constantly underweight
- inappropriate clothing for the conditions

4.3 Changes in behaviour which can also indicate neglect may include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

In addition to the above, staff and volunteers should consider the following types of abuse:

#### **5 Honour Based Abuse (“HBA”)**

HBA encompasses crimes which have been committed to protect or defied the honour of the family and/or the community including Female Genital Mutilation (see below) and forced marriage. All forms of HBA are abuse and should be handled as a safeguarding issue in accordance with the procedures set out in this Policy.

#### **6 Female Genital Mutilation (“FGM”)**

6.1 FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. A potential indicator that a child is at risk of HBA is FGM. The government has identified that the UK communities most at risk include Kenyans, Somalis, Sudanese, Egyptians and Nigerians. However, FGM is also practised in some Middle Eastern and Asian countries: Yemeni, Kurdish, Indonesian and Pakistani girls

are also identified as being vulnerable. Whilst the School's population of pupils from these communities is low, it is important that staff are aware of this issue and know what to do should there be any concerns.

- a. The age at which a girl is likely to undergo FGM depends largely on her ethnic group - the mutilation can be performed at birth, during childhood, during adolescence or sometimes during pregnancy. The mean age globally is 10 years old.
- b. All schools have been advised to look out for a number of signs that may signify that a child is being prepared for FGM, in particular, anxiety leading up to holidays or changes in school attendance can be flags, if a girl belongs to a community in which FGM is practised:
  - Anxiety leading up to holidays: staff should be alert around summer holidays, as this is a time when families may take their child abroad for the procedure.
  - Talk of a 'special ceremony' - Government guidance also suggests that sometimes a child may even talk about a 'special ceremony' that is going to take place, although some girls are not aware before being taken abroad that they will be undergoing FGM.
  - Extended absence from school could point towards the procedure having already taken place. As with other forms of abuse, that absence may well be coupled with a change in behaviour on the child's return.
  - Common psychological effects are depression, anxiety and low self-esteem.
  - There may also be physical signs, such as bladder problems, complaints of pain or discomfort when sitting still.

6.2 Where a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, there is a statutory duty upon that individual to report it to the police **and the teacher must personally report it to the police**. They should also discuss any such case with the DSL and children's social care as appropriate.

6.3 The duty to report to the police does not apply in relation to at risk or suspected cases, or in cases where the girl is 18 or over. In these cases, teachers should follow the safeguarding procedures set out in this Policy.

6.4 In the case of any non-teachers, any discovery or concerns should be reported to the DSL in accordance with the safeguarding procedures.

## **7 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

7.1 Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

7.2 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines or shoplifting or pickpocketing. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised.

7.3 CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as

masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

7.4 Technology is widely used by perpetrators as a method of grooming and coercing victims, often through social networking sites and mobile devices.

7.5 Staff should be alert to the following signs and symptoms which are indicators of both CSE and CCE:

- appearing with unexplained gifts, money or new possessions;
- associating with other young people involved in exploitation;
- suffering from changes in emotional well-being;
- misuse drugs and alcohol;
- going missing for periods of time or regularly come home late; and
- regularly missing school

Additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

## 8 County lines

County lines is a term used to describe gangs and organised criminal networks exploiting children to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines.

## 9 Domestic abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Types of domestic abuse include intimate partner violence, abuse by family members, and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

## 10 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet and includes unauthorised access to computers (illegal 'hacking'), and making, supplying or obtaining malware with the intent to commit offences such as hacking. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

## Appendix 2: Procedures in the event of Allegations Of Abuse Against Staff including Supply Staff Or Volunteers or Governors Or Contractors

### 1 Initial Response

On receiving the allegation, the following action will be taken:

- 1.1 A “case manager” will lead any investigation. This will be either the Head Mistress or, where the Head Mistress is the subject of an allegation, the Chair of Governors. Where the allegation is against the Head Mistress they must not be informed of the allegation prior to their contact with the Chair and LADO.
- 1.2 Where the School identifies:
  - a child has been harmed, or
  - that there may be an immediate risk of harm to a child, or
  - if the situation is an emergency,the School will contact children’s social care and as appropriate the police immediately.
- 1.3 There are two aspects to consider when an allegation is made:
  - Looking after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children’s social care as described in Part 4 (Procedures) in the main part of this Policy.
  - Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
  - The school would not investigate before referral to the LADO.
- 1.4 When dealing with allegations, the School should:
  - apply common sense and judgement;
  - deal with allegations quickly, fairly and consistently; and
  - provide effective protection for the child and support the person subject to the allegation.

Before contacting the LADO, the School should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The School is familiar with what initial information the LADO will require. When to inform the individual of the allegation should be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate children’s social care and the police.
- 1.5 If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children’s social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.
- 1.6 Where the case manager is concerned about the welfare of other children in the community or the member of staff’s family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be necessary for the DSL to make a referral to children’s social care.
- 1.7 Where it is clear that an investigation by the police or children’s social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO will discuss the next steps with the case manager.

- 1.8 If it is decided that no further action is to be taken, this decision and a justification for it will be recorded by both the case manager and the LADO and agreement reached as to what information should be put in writing to the individual concerned and by whom.
- 1.9 Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the School's staff. However, the nature or complexity of the allegation may require the allegation to be investigated by an independent investigator.
- 1.10 The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues.

## **2 Supply teachers/contracted staff**

- 2.1 The School will ensure allegations against a member of supply staff or contracted staff are dealt with properly. In no circumstances will the School cease to use a member of supply staff/contracted staff due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The School will discuss with the agency/contracting company whether it is appropriate to suspend the individual or redeploy them whilst they carry out their investigation. Reports about supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified.
- 2.2 The School shall co-operate in any enquiries from the LADO, police and/or children's social services.
- 2.3 When using an agency/contracting company the School supplies a copy of the Safeguarding (Child Protection) Policy to the agency so they are aware of how the School manages allegations.

## **3 Governors**

If an allegation is made against a governor, the School will investigate the matter and if an allegation is substantiated, they should follow the procedures to consider removing them from office.

## **4 Suspension**

- 4.1 Suspension will not be an automatic response when an allegation is reported; all options to avoid suspension will be considered prior to taking that step.
- 4.2 Suspension will be considered only in a case where there is cause to suspect a child or other children at the School is/are at risk of harm or the case is so serious that it might be grounds for dismissal. The case manager will consider carefully whether the circumstances warrant suspension from contact with children at the School until the allegation is resolved and will always seek advice from the LADO.
- 4.3 In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School, it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency's (TRA) investigation.

4.4 The School will decide on whether the individual should continue to work, based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The Case Manager will be as inventive as possible to avoid suspension. For example, based on assessment of risk, the following alternatives will be considered by the Case Manager before suspending a member of staff:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying to alternative work in the School so the individual does not have unsupervised access to children; or
- Moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted.

4.5 The Case Manager will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

4.6 If immediate suspension is considered necessary, the rationale and justification for such a course of action will be agreed and recorded by both the Case Manager and the LADO. This will also include what alternatives to suspension have been considered and why they were rejected.

4.7 Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched as soon as possible (within one working day), giving as much detail as appropriate for the reasons for the suspension. The person will be informed at the point of their suspension who their named contact is within the School and provided with their contact details.

4.8 The School will always give due weight to the views of the LADO, police and social care services when making a decision about suspension and this decision will be taken on a case by case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

## **5 Support For Those Involved**

5.1 The welfare of a child is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust.

5.2 When an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult who is subject of the investigation, and potentially for their family members. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation. The School, as the employer, has a duty of care to its employees and it should:

- manage and minimise the stress inherent in any such allegations and disciplinary process;
- inform the individuals of the concerns or allegations as soon as possible and given an explanation of the likely course of action (guided by the LADO and police as applicable);
- advise the individual to contact their trade union if they belong to one or a colleague for support. They also have access to the School's counsellors and the Care First Employee Assistance Programme;

- appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case, including if they are suspended, and will consider what additional support may be required;
- not prevent social contact with colleagues or friends will unless there is evidence that such contact is likely to be prejudicial to the gathering and presentation of evidence.

5.2 Parents or carers of a child or children involved should be:

- formally told about the allegation as soon as possible and providing the LADO/children's social care/police have agreed, what information can be disclosed.
- kept informed about the progress of the case in relation to their child, not the staff member.
- made aware of confidentiality/reporting restrictions.

## 6 Confidentiality and Information Sharing

6.1 In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

6.2 Where the police are involved, wherever possible the School should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process.

6.3 The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The School acknowledges that it is an offence for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation). Where the School needs to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

6.4 The Case Manager will take advice from the LADO, police and children's social care services to agree the following:

- Who needs to know and what information can be shared.
- How to manage speculation, leaks and gossip.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest.

## 7 Allegation Outcomes

7.1 The following terms will be used when determining the outcome any investigation:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person the subject of the allegation;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

7.2 The options open to the School depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not

be the default position; an individual should be suspended only if there is no reasonable alternative (see above).

7.3 If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services

the employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

**There is a legal requirement for the School as an employer to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:**

- engaged in relevant conduct in relation to children and/or adults,
- satisfied the harm test in relation to children and/or vulnerable adults; or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

7.4 Where the School dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency) to consider prohibiting the individual from teaching.

7.5 Referrals will be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from regulated activity (by suspension, resignation, dismissal, resignation etc.).

7.6 Where a referral has been made to the DBS, a referral will also to be made to TRA.

## **8 Action Following A Criminal Investigation Or A Prosecution**

8.1 The police will inform the School immediately once a criminal investigation and any subsequent trial is complete or if it is decided to close an investigation without charge or not to continue to prosecute the case after the person has been charged.

8.2 In those circumstances the LADO should discuss with the School whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services will inform that decision. The options will depend on the circumstances of the case and the consideration will take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

## **9 Action In Case Of Unfounded Or Malicious Allegations**

In the event that an allegation is shown to have been deliberately invented or malicious, the DSL will consider whether the child or person who made the allegation is in need of help or may have been abused by someone else and whether a referral to children's social care may be appropriate. The School will consider whether any disciplinary action is appropriate against the pupil.

## **10 Returning to Work**

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that.

## **11 Resignations And 'Compromise Agreements'**

- 11.1 Settlement/compromise agreements, by which a person agrees to resign if the School agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.
- 11.2 If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with this Policy.
- 11.3 The School acknowledges the importance of ensuring that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused will be given a full opportunity to answer the allegation and make representations about it. Nevertheless, the process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated on the basis of all the information available, will continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion (or impose disciplinary sanctions) in those circumstances, but the School will endeavour to reach a conclusion wherever possible.
- 11.4 Where a settlement/compromise agreement is used, the School must not let it prevent it from (1) fulfilling its duty to refer cases to the DBS where the referral criteria are met; providing a reference to potential employers when requested; or (3) considering whether to make a referral to the TRA where the criteria are met.

## **12 Record Keeping**

- 12.1 Details of allegations that are found to have been malicious will be removed from any personnel records.
- 12.2 For all other allegations the following shall be kept on the file of the person accused:
- a clear and comprehensive summary of the allegation,
  - details of how the allegation was followed up and resolved and a note of any action taken and decisions reached,
  - the outcome categorised as set out at Paragraph 7.1 above,
  - a copy given to the person concerned (where agreed by children's social care or the police), and
  - a declaration on whether the information will be referred to in any future reference (see Paragraph 12 below).
- 12.3 The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.
- 12.4 The record will be retained at least until the person has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

## **13 References**

Cases in which an allegation was found to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. Substantiated allegations should be included in references provided the information is factual and does not include opinions.

#### **14 Learning Lessons**

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the School's procedures to help prevent similar events in the future. For all other cases the case manager should consider the facts and determine whether any improvements can be made.

#### **15 Non recent allegations**

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened.

## Appendix 3: Procedures in the event of reports of child on child sexual violence and sexual harassment

### 1 Introduction

#### 1.1 Sexual Violence is defined as offences under the Sexual Offences Act 2003:

- rape,
- assault by penetration,
- sexual assault,
- causing someone to engage in sexual activity without consent and can happen both inside and outside of School.

#### 1.2 Sexual Harassment is defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of School. It can be standalone or part of wider abuse. 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: making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone; and
- online sexual harassment (which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence) including: consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, sexualised online bullying, unwanted sexual comments and messages, including, on social media, and sexual exploitation; coercion and threats.

#### 1.3 The School seeks to provide support to its pupils at all ages through preventative education including for example, sessions on healthy friendships and relationships and rape awareness and prevention.

#### 1.4 In the event of a report of child on child sexual violence or sexual harassment, the School’s procedures are in accordance with Part Five of KCSIE and the Department of Education advice “Sexual violence and sexual harassment between children in schools and colleges”.

#### 1.5 It is recognised that reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. This part of the Policy sets out the School’s principles in considering reports but it must be stressed that each case must be considered on a case by case basis. The DSL (or a Deputy) will always take the lead role and use their professional judgement support by other agencies (children’s social care, police etc.).

#### 1.6 Staff should remain aware that:

- Scenarios can occur between two children of any age and sex.
- Scenarios could take place in or outside School and/or online, between pupils at the School or between pupils at the School and children at another school/college or not at school/college.
- They must maintain an attitude of ‘it could happen here’.
- Whilst any report of sexual violence or sexual harassment should be taken seriously, it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a

member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

A child is anyone under the age of 18.

- 1.7 Addressing inappropriate behaviour at any early stage (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future and more detail on this is provided in the Policies to Promote Good Behaviour (Senior and Junior).

## 2 Responding to a Report of Sexual Violence and/or Sexual Harassment

- 2.1 The School's initial response to a report from a child is extremely important. Staff should be clear that:

- The School will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of School.
- Abuse that occurs online or outside of School should not be downplayed and should be treated equally seriously.
- How the School responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.
- It is essential that all victims are reassured that they are being taken seriously regardless of how long it has taken them to come forward and that they will be supported and kept safe.
- **A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.**
- An initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

- 2.2 The principles set out in Paragraph 4.1.3 of the Policy when receiving a safeguarding disclosure apply exactly the same when the report relates to sexual violence/harassment (as regards not promising confidentiality, only asking open questions, making a record as quickly as possible, being respectful of the pupil's trust, and informing the DSL or a Deputy without delay). Staff should also consider:

- If possible, managing a report with two members of staff present (preferably one of them being the DSL or Deputy). However, this might not always be possible.
- It is essential a written record is made. In making the report, best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. If making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. The notes should not reflect the personal opinion of the note taker as reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation. Any report should use the child's language. Whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Where the report includes an online element, staff should be aware of "Searching screening and confiscation: Advice for Schools" and UKCIS "Sharing nudes and semi-nudes: advice for education settings working with children and young people". **Staff must not view or forward illegal images of a child**, but the afore-mentioned advice provides more details on what to do when viewing an image is unavoidable. In some

cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection. Please also see the School's Digital Safety Policy.

### **3 Risk Assessment**

- 3.1 When there has been a report of sexual violence, the DSL (or Deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.
- 3.2 The risk and needs assessment should consider:
- the victim, especially their protection and support;
  - whether there may have been other victims;
  - the alleged perpetrator(s); and
  - all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- 3.3 Risk assessments should be recorded (written or electronic) and should be kept under review at all times actively considering the risks posed to all pupils and put adequate measures in place to protect them and keep them safe.
- 3.4 The DSL (or Deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required, and these will be used to inform the School's approach to supporting and protecting pupils and updating its own risk assessment.

### **4 Action following a report of sexual violence and/or sexual harassment**

What to consider

- 4.1 On a report of sexual violence/harassment, the DSL (or a Deputy) will advise on the School's initial response and actions taking into account, amongst other things:
- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the School's duty and responsibilities to protect other children;
  - the nature of the alleged incident(s), including: whether a crime may have been committed an/or whether harmful sexual behaviour has been displayed;
  - the ages of the children involved;
  - the developmental stages of the children involved;
  - any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
  - if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
  - that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
  - are there ongoing risks to the victim, other children, or School staff; and
  - other related issues and wider context (see Paragraph 3.1.3 of the main Policy).

- 4.2 As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, staff should follow general safeguarding principles as set out throughout this Policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- 4.3 The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable, and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as 'banter', 'boys will be boys', 'part of growing up' or 'just having a laugh'.

#### Children sharing a classroom/coach

- 4.4 Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult with regard to the victim and close proximity with the alleged perpetrator is likely to be especially distressing. Whilst the School establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes/activities they share with the victim. The School should also carefully consider how best to keep the victim and alleged perpetrator a reasonable distance apart on School premises and on transport to and from School where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).
- 4.5 For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing School premises and School transport, should be considered immediately.

#### Options to manage the report

- 4.6 The School will consider every report on a case-by-case basis including when to inform the alleged perpetrator(s). Where a report is going to be made to children's social care and/or the police, then the School will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, the School will take immediate action to safeguard their children, where required.
- 4.7 There are four likely scenarios for the School to consider when managing any reports of sexual violence and/or sexual harassment as set out below. Whatever the response, it will always be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded whatever the decision. All decisions and actions will be regularly reviewed, and relevant policies updated to reflect lessons learnt particularly arising from evidence of patterns of concerning, problematic or inappropriate behaviour. Consideration should be given to whether there are wider cultural issues within the School or transport to/from School that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.
  - 4.7.1 Manage internally: In some cases of sexual harassment, for example, one-off incidents, the School may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, through using other policies (e.g. Anti-Bullying) and by providing pastoral support.
  - 4.7.2 Early help: The School may decide that the children involved do not require referral to

statutory services but may benefit from early help; providing support as soon as a problem emerges, at any point in a child's life. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. Early help and the option to manage a report internally do not need to be mutually exclusive.

**4.7.3 Referrals to children's social care:** Where a child has been harmed, is at risk of harm, or is in immediate danger, the School will make a referral to local children's social care. At the point of referral to children's social care, the School will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care. If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, the School (especially the DSL or a Deputy) should be working alongside, and cooperating with, the relevant lead social worker. It will be important for the DSL or a Deputy to work closely with children's social care (and other agencies as required) to ensure any actions the School takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 3 of this Appendix will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the School should be immediate. In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The School (generally led by the DSL or a Deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL or a Deputy should consider other support mechanisms such as early help, specialist support and pastoral support.

**4.7.4 Reporting to the Police:**

- Any report to the police will generally be in parallel with a referral to children's social care (as above at 4.7.3). Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police (even if the alleged perpetrator is under ten). The School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.
- At this stage, the School will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk (in which case the School will support the child in any decision it takes with the support of children's social care and any appropriate specialist agencies).
- Where it becomes evident that the police (for whatever reason) will not take further action the School will continue to engage with specialist support for the victim as required.
- When there is a criminal investigation, the School will engage early and work closely with children's social care and the police to support the victim, alleged perpetrator(s) and other children involved (especially potential witnesses).
- There may be delays in any case that is being progressed and the School will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the School (operating the risk assessment as per paragraph 3 of this Appendix 3).
- If a child is convicted or receives a caution for a sexual offence, the School will update its risk assessment, ensure relevant protections are in place for all the children at the School and, if it has not already, consider any suitable actions to take in line with their Policies to Promote Good Behaviour. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s)

remain in School as the victim, the School should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. The School will ensure both the victim and alleged perpetrator(s) remain protected, especially from any bullying or harassment (including online).

- Where cases are classified as “no further action” (NFA’d) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the School will continue to offer support to the victim and the alleged perpetrator for as long as is necessary.

#### Unsubstantiated, unfounded, false or malicious reports:

- 4.6 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate.
- 4.7 If a report is shown to be deliberately invented or malicious, the School should consider whether any disciplinary action is appropriate against the individual who made it in accordance with the Policies to Promote Good Behaviour.

## **5 Ongoing Response**

### Safeguarding and supporting the victim

- 5.1 The following principles should be considered in making any decisions regarding safeguarding and supporting the victim:
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the School is a safe space for them.
  - The age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. By the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
  - The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
  - Consider the proportionality of the response. Support should be tailored on a case-by-case basis and a lot of external support is available such as: Children and Young People’s Independent Sexual Violence Advisors (ChISVAs), Child and adolescent mental health services (CAMHS), Rape Crisis Centre’s, and the Internet Watch Foundation (to potentially remove illegal images).
- 5.2 Victims may talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the School will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or DSL) to talk to about their needs. The choice of any such adult should be the victim’s as far as reasonably possible.
- 5.3 A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. The School will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities and the School will provide a safe space for this.

- 5.4. The School will protect and provide support as long as is necessary working with children's social care and other agencies as required.
- 5.5 The School will do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- 5.6 Whilst they should be given all the necessary support to remain in School, if the trauma results in the victim being unable to do this, alternative provision or a move to another School should be considered. This should only be at the request of the victim (and following discussion with their parents or carers). If the victim does move to another educational institution (for any reason), that the new educational institution will be made aware of any ongoing support needs, and this shall be the responsibility of the DSL.

Ongoing Considerations: Victim and alleged perpetrator sharing classes

- 5.7 Once the DSL has decided what the next steps will be in terms of progressing the report, they should consider again the question of the victim and alleged perpetrator(s) sharing classes/space/transport at or to from School. Each report will be considered on a case-by-case basis and risk assessments will be updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first. The School will consider and review its decisions and actions as matters progress: whether there is a criminal investigation, and then whether or not there is a conviction or caution. The School will record their justifications for decisions at each stage.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

- 5.8 The following principles should be considered in making any decisions regarding safeguarding and supporting the alleged perpetrator:
  - The balance between safeguarding the victim (and the wider pupil body) and providing the alleged perpetrator(s) with an education, safeguarding support as appropriate and implementing any disciplinary sanctions.
  - The age and the developmental stage of the alleged perpetrator(s) and nature/frequency of the allegations.
  - Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.
  - If the alleged perpetrator does move to another educational institution (for any reason) the new educational institution will be made aware of any ongoing support needs and where appropriate, potential risks to other children and staff (and this is the responsibility of the DSL).

## **Appendix 4: Code of Conduct for Working with Children and Young Adults**

### **1. Introduction**

- 1.1 The purpose of this Code of Conduct is to confirm and reinforce the professional responsibilities of all adults associated with the School, including teachers, non-teaching staff, Governors and volunteers, with regard to their relationship with pupils; to clarify the legal position in relation to sensitive aspects of staff/pupil relationships and to set out the expectations of standards to be maintained within the School.
- 1.2 This Code of Conduct also applies to pupils at other schools with which LEH has professional links, for example Hampton School. It should be noted that, unless pupils leave mid-year, they remain pupils at the School until 31<sup>st</sup> August in the year in which they leave.
- 1.3 The School's aim is to create an environment and culture that ensures, as far as reasonably possible, the safety and well-being of all pupils in its care at any given time, whether in School or on a trip or visit.

### **2. Core Principles**

- 2.1 Staff should treat pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to their professional position.
- 2.2 Staff must have regard to the expectation that they will actively promote fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, the rights of others and tolerance of those with different faiths.
- 2.3 Staff have an obligation under the Prevent strategy to understand and engage with the Channel process, to help identify those vulnerable to radicalisation and their behaviours, and make referrals within and, if necessary, outside the School.
- 2.4 Staff must ensure that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law.
- 2.5 Teaching staff must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.
- 2.6 Staff should understand the need to act as good role models for pupils and the School expects its staff to behave in a thoroughly professional manner and to set an example to pupils through high standards of personal behaviour.
- 2.7 Staff must have regard for the need to safeguard pupils' well-being, in accordance with statutory provisions and this Policy of which this Code forms part. They must also ensure they are aware of the Staff Recruitment and Selection Policy and in particular that should any staff have a visitor on site they must be signed in and given a Visitors Badge at Reception on arrival and supervised at all times while on the School site.

### **3. Safeguarding**

- 3.1 Adults in schools may be vulnerable both to the possible consequences of close professional relationships with pupils and to malicious or misplaced allegations made by pupils deliberately or innocently arising from their normal and proper association with them in school.
- 3.2 This Code is intended to give practical advice to staff, so that they know what to do should a safeguarding matter arise, and to ensure their conduct and relationships are, and are

seen to be, entirely proper. Reference is made to related policies where further guidance and advice may be obtained.

- 3.3 It is, however, impossible to lay down hard and fast rules to cover all the circumstances in which School staff relate to pupils and where opportunities for their conduct to be misconstrued might occur. Therefore, in all matters relating to pupil/staff relationships, staff must bear in mind how an action might reasonably be regarded by a third party. Staff should avoid any conduct which would lead any reasonable person to question the member of staff's motivation and intentions. At no time should staff undertake any action which could bring the School into disrepute.
- 3.4 It is realised that some staff will also know pupils and their parents under different circumstances from their professional relationship with them in School, for example, as neighbours, children of personal friends, or family members. In addition, some members of staff may have children at the School. This Code should therefore be read and, where appropriate, interpreted with this in mind (for example, with regard to gifts). It is therefore important that staff should exercise professional judgment where social contact with pupils and their families occurs, and where there may be a perceived conflict of interest. Staff should always seek advice from the relevant member of the Senior Management Team as required.

#### **4. Confidentiality**

- 4.1 The School has a responsibility for the welfare of its pupils. The issue of confidentiality can arise in discussions with pupils, and staff must never agree to keep disclosed information confidential and should pass such information immediately to the relevant senior member of staff, if there is a risk of harm.
- 4.2 Confidential information about the School, or any member of the School community, including pupils' parents, and staff, should never be used casually in conversation or shared with any person other than on a professional 'need to know' basis.

#### **5. Working with Pupils**

##### **5.1 Written Communication with Pupils, including eCommunications**

- a. Staff should at all times follow the Staff Acceptable Use of IT Policy.
- b. Staff should not divulge personal email or mobile phone numbers to pupils, nor should they be used when communicating with pupils, including by text message.
- c. Only School email accounts should be used when staff are communicating with pupils, and when pupils communicate with staff.
- d. On School trips, a School mobile should be used: staff personal mobile numbers should remain confidential.
- e. Staff should not invite pupils (or accept any invitation from pupils) to be their 'friend' or 'connect' on Facebook or other personal social media/networking sites, such as Twitter, Instagram, LinkedIn etc., nor communicate with pupils via such sites for at least two years after the pupil has left School. Even then, staff should also think very carefully before communicating in such a way (including on the LEH Alumnae Portal (Holles Connect) unless they are using their LEH email address) with past pupils, especially where the former pupil has a sibling who remains at the School.
- f. Staff who have profiles on social media/networking sites should protect them appropriately. (Guidelines for protecting a Facebook account are to be found in the Staff Handbook under "Privacy Settings on Facebook")
- g. Staff using e-mail and text messaging, or similar, need to ensure that such communication remains suitably formal in content and language.

- h. All correspondence with or about pupils should remain professional at all times. Such documentation may be subject to a data protection request or could be used in any ensuing complaint and an untoward comment could lead to unforeseen and unintended consequences.

*See also: Data Protection Policy  
Staff Acceptable Use of IT Policy  
Trips and Expeditions Policy  
Privacy Settings on Facebook (Staff Handbook)*

## 5.2 Images and recordings

- a. Only School equipment - e.g. School cameras, iPads, or iPhones - should be used to capture images of pupils or filming of any description. In all cases, the pupils need to be aware that they are being filmed and that this is not being done without their knowledge.
- b. School equipment will be provided as required.
- c. Any images or recordings must be only downloaded to, and stored on, School equipment for School use. They must not be downloaded to personal equipment.

*See also: Staff Acceptable Use of IT Policy*

## 5.3 Physical contact with pupils

- a. LEH does not ban physical contact with pupils and indeed circumstances may arise when it is appropriate for staff to use reasonable force (i.e. using no more force than needed) to safeguard pupils e.g. guiding them to safety or restraining them. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.
- b. However, staff are advised not to make unnecessary physical contact with pupils. Physical contact which might be misconstrued by the pupil, parent or casual observer should be avoided.
- c. There may be occasions when a distressed child needs comfort and reassurance which may include physical comforting such as a caring parent would offer. In such circumstances, it may be appropriate to seek the agreement of the pupil before comfort is offered.
- d. PE staff are likely to come into physical contact with pupils from time to time in the course of their teaching or other work, for example when showing a pupil how to use a piece of apparatus or equipment or whilst demonstrating a move or an exercise during PE and Games.
- e. Drama staff are likely to come into physical contact with pupils in teaching of physical theatre.
- f. Visiting Music Teachers: in line with guidance from the Musicians' Union, there should be no physical contact with pupils in the teaching of musical instruments (see 'Guidelines for Visiting Music Teachers'). We do acknowledge, however, that there may be occasions where the pupil may benefit from some demonstration of posture or breathing, which might include some limited physical contact with the pupil. If the VMT feels that this would improve technique or performance, then the VMT should first discuss this with the Director of Music, and if she concurs, then limited physical contact can take place, but only with the Director of Music present and with agreement from the pupil concerned.
- g. Following any incident where members of staff feel that their actions have been or may be misconstrued, a written report of the incident should be submitted immediately to the Designated Safeguarding Lead. This could apply especially in a case where a member of staff has been obliged to restrain a child physically to prevent them from inflicting injury to others or self-injury.

#### 5.4 Private meetings with pupils

- a. Staff should be aware of the sensitivities which could arise from private interviews with individual pupils.
- b. It is recognised that private interviews carry with them responsibility for pupil welfare and that there is a risk involved in such meetings. Such interviews should be conducted in a room with visual access. If there is no window, the door must be left open.
- c. If any form of physical contact which may be open to misinterpretation does occur during a private interview, it must be reported immediately to the Designated Safeguarding Lead, and a written record kept.

#### 5.5 Relationships with pupils

- a. Staff must be aware that it is an offence under the Sexual Offences Act 2003 for a person over the age of 18 and in a position of trust to have a sexual relationship with a child under 18, even if the relationship is consensual. It is a very serious disciplinary matter (and very likely, serious legal matter) for any adult working or volunteering at the School to have any contact of a sexual nature with pupils, including those in the Sixth Form, or to groom pupils for such contact. The School will always report such matters to the Disclosure and Barring Service (DBS), Police, and Social Services, as well as taking its own disciplinary action, which will be dismissal. Other forms of inappropriate conduct will also be dealt with through the School's disciplinary procedures as a matter of serious concern and referred to the appropriate authorities.
- b. Staff should not give pupils their home address, home or mobile phone numbers, personal email address, or other personal data (see 'Written Communication with Pupils').
- c. Staff should not make arrangements to meet pupils, individually or in groups, outside School other than on authorised School trips or events.
- d. Staff should not form personal friendships with pupils.
- e. Staff should discuss with the Designated Safeguarding Lead, as soon as possible, if they feel a pupil has an infatuation with them.
- f. Staff should ensure that their interactions with pupils are appropriate to the age and gender of the pupils, taking care that their conduct does not give rise to comment or speculation and ensuring that their actions and behaviour do not put pupils or themselves at risk of harm or of allegations of harm to a pupil. Demeanour and language therefore require care and thought.

#### 5.6 Transportation

Pupils may only be transported in staff cars if:

- There is written permission from the parent;
- Seatbelts are worn;
- The car is road-worthy;
- Children should not be transported alone;
- Such use of staff cars should be noted on the relevant Risk Assessment.

Staff should not be transported in pupils' cars.

*See also: Trips and Expeditions Policy (including Health and Safety on School trips)*

#### 5.7 School Trips

Staff should be particularly careful when supervising pupils in a residential setting or on an extended visit away from home, where a more informal atmosphere tends to be usual

and where staff may be in proximity to pupils in circumstances very different from the normal School environment.

*See also: Trips and Expeditions Policy (including Health and Safety on School trips)  
Drugs and Substance Misuse Policy*

## 5.8 Gifts

- a. Teachers should not give personal presents to an individual pupil. Prizes should only be given to pupils in line with departmental policy for rewards.
- b. Staff should not accept gifts or favours from pupils on a regular basis.
- c. Gifts received from pupils or parents should be recorded in line with the Anti-Corruption and Bribery Policy.

*See also: Anti-Corruption and Bribery Policy*

## 5.9 Remote/Hybrid Teaching

Staff must comply with the Remote and Hybrid Teaching Policy when undertaking any remote or hybrid teaching.

## 6. Concerns that do not meet the harm threshold (Low Level Concerns)

- 6.1 There may be occasions when concerns about a member of staff, supply staff, volunteer, contractor, governor etc. do not meet the harm threshold set out in Paragraph 4.5.3 of the Safeguarding (Child Protection) Policy. These concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside School; or as a result of vetting checks undertaken.
- 6.2 The School 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, contractors and governors) are dealt with promptly and appropriately. The aim is to enable the safeguarding team to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse arising and ensure that adults working in School (i) are clear about professional boundaries, (ii) understand the behaviours that are expected of them and (iii) act within them as set out in this Code of Conduct. The School encourages staff (including supply staff), volunteers, contractors and Governors etc. to share **any** concerns, no matter how small, about their colleagues' or indeed their own behaviour with the Headmistress.
- 6.3 A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the School may have acted in a way that:
  - is inconsistent with the code of conduct set out in Appendix 4, including inappropriate conduct outside of work, and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 6.4 Examples of such behaviour could include, but are not limited to:
  - being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door;or,

- using inappropriate sexualised, intimidating or offensive language.
- 6.5 Low level concerns about a member of staff, supply staff, volunteer, contractor of governor should be immediately reported to the Headmistress. Low level concerns about the Headmistress should be reported to the Chair of Governors. Please note that this can include any sort of behaviour that causes concern, not just what is listed above. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
- 6.6 Staff are encouraged to refer themselves if necessary. In self-referring staff may be worried that something could be reported incorrectly, or taken out of context, at a later stage. For example, they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. In addition, staff should consider their relationships and associations both inside and outside the workplace and staff are encouraged to discuss with the Head Mistress matters outside of work which may or could be perceived to have implications for the safeguarding of children in the workplace.
- 6.7 All low-level concerns should be recorded in writing. The record should include:
- details of the concern,
  - the context in which the concern arose,
  - evidence collected by the DSL when the concern has been raised via a third party,
  - decision categorising the type of behaviour,
  - decisions and action taken (and rationale),
  - the name of the individual sharing their concerns; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- The records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 6.8 Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again. Records will be retained at least until the individual leaves their employment.
- 6.9 The School will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.
- 6.10 The Head Mistress will collect as much evidence as possible by speaking:
- directly to the person who raised the concern, unless it has been raised anonymously;
  - to the individual involved and any witnesses.
- The Head Mistress will investigate the matter sensitively and as required, address unprofessional behaviour, supporting the individual to correct it at an early stage. All information collected will be recorded and help to categorise the type of behaviour and determine what further action may need to be taken. Actions and rationale will also

be recorded, reviewed, followed up and updated as required. The records will be regularly reviewed to identify any patterns of behaviour by an individual or by staff generally which may reflect a requirement to update policies or training etc.

## **7. Whistleblowing**

If staff or volunteers have any concerns at any time about poor or unsafe practice, or potential failures in the School's safeguarding regime they should follow the whistleblowing procedure set out in Paragraph 2.10 of the Safeguarding (Child Protection) Policy.

## Appendix 5: Signs of Radicalisation

- 1 The School recognises that those who are at risk of being drawn into extremism or terrorism are likely to have a range of vulnerabilities. These will include a number of ‘push’ and ‘pull’ factors, often related to negative perceptions of their belonging, purpose or self-worth.
- 2 Staff, pupils or parents may see some of the general signs which may indicate an issue such as a change in attitude/ character, appearance or dress, or academic performance. In addition, the Prevent Strategy groups factors under the headings of ‘engagement’, ‘intention’, and ‘capability’.
- 3 Factors which might suggest **engagement**:
  - spending increasing time in the company of other suspected extremists;
  - changing their style of dress or personal appearance to accord with the group;
  - day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
  - loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
  - possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
  - attempts to recruit others to the group/cause/ ideology; or
  - communications with others that suggest identification with a group/cause/ideology.
- 4 Example indicators that an individual has an **intention** to cause harm, use violence or other illegal means include:
  - clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
  - using insulting or derogatory names or labels for another group;
  - speaking about the imminence of harm from the other group and the importance of action now;
  - expressing attitudes that justify offending on behalf of the group, cause or ideology;
  - condoning or supporting violence or harm towards others; or
  - plotting or conspiring with others.
- 5 Example indicators that an individual is **capable** of causing harm or contributing directly or indirectly to an act of terrorism include:
  - having a history of violence;
  - being criminally versatile and using criminal networks to support extremist goals;
  - having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or
  - having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).
- 6 The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. Outward expression of faith, in the absence of any other indicator of vulnerability, is not a reason to make a referral to Channel.

## **Appendix 6: Job Description for the Designated Safeguarding Lead (and Deputies) at Lady Eleanor Holles**

A senior member of staff will be appointed to the role of Designated Safeguarding Lead.

There are always at least two Deputy Designated Safeguarding Leads, one from the Senior School, and ordinarily on the Senior Management Team, and one from the Junior School, ordinarily the Head of the Junior School, who is also on the Senior Management Team however, the ultimate lead responsibility for safeguarding and child protection (including online safety) remains with the DSL.

The broad areas of responsibility for the Designated Safeguarding Lead and, in their absence, the Deputy Designated Safeguarding Leads, are outlined below:

### **1. Managing referrals**

- The DSL is expected to refer cases:
  - of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to the local authority's social care;
  - to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme;
  - where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service,
  - where a crime may have been committed to the Police as required.
- Keep the Head Mistress informed of all safeguarding matters especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the 'Case Manager' and LADO in cases which concern a member of staff. Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the three safeguarding partners;
- Liaise with staff (especially teachers, pastoral support staff, School nurses, IT Technicians, senior mental health leads and SENCOs) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies. Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Work with the Head Mistress and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at School.
- Ensure that referrals are made in line with relevant local procedures.
- Report termly to the Governors,
- Contact one of the Nominated Safeguarding Governors about incidents where the following criteria apply:
  - Referrals to agencies
  - Concern about reputational damage e.g. formal complaint from parent, police involvement (directly or indirectly related to the case)
  - Hampton School involvement
  - Significant period of exclusion from the schoolThis should be followed up with a confirmation email copying in both safeguarding governors and then updates as relevant.

### **2. Training, Knowledge and Skills**

#### **a. Training of Staff**

Ensure that all staff training is updated every three years, in accordance with the School's Safeguarding (Child Protection) Policy. Ensure that an accurate record of staff safeguarding and Prevent training is kept by the HR Department.

#### **b. Training of the Designated Safeguarding Lead and Deputies**

In line with best practice,

- Receive Level 3 training every two years in order to:
  - Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
  - Understand how to identify understand and respond to specific needs that can increase the vulnerability of children as well as specific harms that can put children at risk and the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so. Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Can recognise the additional risks that children with SEN and disabilities (SEND) and those with relevant health conditions face online and otherwise, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
- Undertake Prevent Awareness training and understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk or radicalisation.
- In addition, each member of the Designated Safeguarding team should attend at least one relevant training course/conference in the year they do not receive Level 3 training in order to ensure that the team's knowledge is up-to-date and covers a diverse range of safeguarding areas

#### **c. Training of the Governing Body**

Ensure that the Governors receive the Annual Update training (by video if necessary).

### **3. Children in need**

Co-ordinate the School's role in supporting pupils where it is considered that a child is in need and additional intervention is required, for example, using the 'Common Assessment Framework' (CAF) and 'Team Around the Child' (TAC) approaches.

### **4. Looked After Children**

Acting as the Designated Member of Staff for Looked After Children and ensuring implementation of that policy as set out in Appendix 7.

### **5. Raising Awareness**

The Designated Safeguarding Lead should ensure that the School's safeguarding policies are known and used appropriately:

- Ensure that the Safeguarding (Child Protection) Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body, in particular, the designated Governors for Safeguarding (including Looked After Children) regarding this.
- Ensure the Safeguarding (Child Protection) Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this process.
- Link with the Kingston and Richmond Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

#### **6. Record Keeping and Sharing Information**

- Ensure they are able to keep detailed, accurate, secure written records of concerns and referrals. Records should include: a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome.
- Ensure they understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation and understand the importance of information sharing, both within the School and with the safeguarding partners and other agencies/organisations and practitioners etc. The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely.
- Where children leave the School, ensure that their child protection file is transferred to the new school as soon as possible and within 5 days for an in-year transfer or within 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving e.g. information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

#### **7. Links with agencies**

Develop effective links with relevant statutory and voluntary agencies.

#### **8. Availability**

Be available during term time for staff to discuss safeguarding concerns, and ensure her deputy is available if she is not.

## **Appendix 7: School's arrangements for education of looked after children (LACS)**

### **1. Definitions**

- 1.1 The term Looked After Children has a specific legal meaning based on the Children Act. A child is looked after by a local authority if he or she has been provided with accommodation for a continuous period of more than 24 hours, in the circumstances set out in sections 20 and 21 of the Children Act 1989 or is placed in the care of a local authority by virtue of an order made under part IV of the Act.
- 1.2 For the purposes of this Appendix, reference to looked after children shall include those who are previously looked after children and who have left care e.g. through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

### **2. Background**

Nationally, Looked After Children significantly underachieve and are at greater risk of exclusion compared with their peers. Schools have a major part to play in ensuring that Looked After Children are supported to be healthy, stay safe, enjoy, achieve, make a positive contribution to society and achieve economic well-being, in line with the precepts laid out in Every Child Matters 2004.

### **3. Statutory Framework**

- 3.1 The School recognises the importance of helping Looked After Children (hereafter LACs) succeed and providing a better future for them. This policy therefore takes account of:
- Statutory guidance: Promoting the education of looked-after children and previously looked after children
  - Statutory guidance: Designated teacher for looked-after children and previously looked after children
- 3.3 Should the School have any LACS at any time, it will, so far as is possible given its status, work within the framework established by the statutory guidance for maintained schools in supporting any LACs on the school roll.

### **4. Principles**

The approach of supporting the educational achievement of Looked After Children is based on the following principles:

- Prioritising education;
- Promoting attendance;
- Targeting support;
- Having high expectations;
- Promoting inclusion through challenging and changing attitudes;
- Achieving stability and continuity;
- Early intervention and priority action;
- Listening to children;
- Promoting health and well-being;
- Reducing exclusions and promoting stability;
- Working in partnership with carers, social workers and other professionals;

## 5. Aims

- 5.1 As for all its pupils, the School is committed to helping every LAC to achieve the highest standards they can, including supporting aspirations to achieve in further and higher education. This can be measured by improvement in their achievements and attendance.
- 5.2 The School will champion the needs of LACs, raise awareness and challenge negative stereotypes about them, in order to ensure that they achieve to the highest level possible.

## 6. Roles and Responsibilities

### 6.1 *The Governing Body*

The Governing Body (GB) will carry out those responsibilities outlined in statutory guidance: [Promoting the education of looked-after children](#), including, but not limited to, the following:

- Identifying two nominated Governors for LACs (who will be this will be the same Governors as identified as responsible for safeguarding matters).
- Ensuring that all Governors are fully aware of the legal requirements and guidance on the education of LACs.
- Ensuring the School has an overview of the needs and progress of LACs.
- Allocating resources to meet the needs of LACs.
- Ensuring the School's other policies and procedures (in particular those listed at the start of this Policy) support their needs.
- Monitoring the academic progress of LACs, through an annual report supplied by the DSL.
- Working to prevent exclusions and reduce time out of School, by ensuring the School implements policies and procedures to ensure LACs achieve and enjoy their time at the School, by recognising the extra problems caused by excluding them and by using exclusion only as a last resort.
- Ensuring that the School has a Designated Teacher for LACs, and that this Designated Teacher is enabled to carry out his or her responsibilities as below.
- Supporting the Head Mistress and other staff in ensuring that the needs of LACs are recognised and met.
- Ensuring a Personal Education Plan (PEP) is put in place, implemented and regularly reviewed for every LAC, in line with statutory guidance on PEPs.
- Receiving a report once a year from the DSL setting out:
  - The number of looked-after pupils on the School's roll (if any).
  - Their attendance, as a discreet group, compared to other pupils.
  - Their results in public exams, as a discreet group, compared to other pupils.
  - The number of fixed term and permanent exclusions (if any).
  - The destinations of pupils who leave the School.
  - The information for this report should be collected and reported in ways that preserve the anonymity and respect the confidentiality of the pupils concerned.

### 6.2 *The Head Mistress and the DSL*

The Head Mistress and the DSL are responsible and will carry out those responsibilities outlined in statutory guidance: Promoting the education of looked-after children, including but not limited to ensuring implementation of the following:

- A Designated Teacher being identified for LAC, whose role is set out below and another appropriate person is identified quickly should the Designated Teacher leave the School or take leave. The Designated Teacher will ordinarily be the DSL, and their respective Deputies will usually act as the Designated Teacher should they leave the School or take leave.
- Procedures being in place to monitor the admission, progress, attendance and any exclusion of LACs and take action where progress, conduct or attendance is below expectations.
- Maintaining accurate records and reporting on the progress, attendance and conduct of LACs, so that Governors or inspectors may select a number of LACs and are able to track their results and the support they have received.
- Ensuring staff at the School receive relevant training and are aware of their responsibilities under this policy and related guidance and that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This includes ensuring that staff have up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers, and information available to the designated person.

### 6.3 *The Designated Teacher(s)*

The School's Designated Teacher(s) will take on those responsibilities outlined in statutory guidance: Promoting the education of looked-after children, including but not limited to the following:

- Undertaking appropriate training as and where necessary to be able to support any LACs on the School roll.
- Contributing as required to inter-agency working or development planning in respect of LACs on the School roll.
- Ensuring a welcome and smooth induction for the child and their carer, using the PEP to plan for that transition in consultation with the child's social worker;
- Ensuring that a Personal Education Plan is completed with the child, the social worker, the foster carer and any other relevant people, in good time before any Care Plan reviews;
- Ensuring that each Looked After Child has an identified member of staff that they can talk to. This need not be the Designated Teacher, but should be based on the child's own wishes;
- Tracking academic progress and target support appropriately;
- Co-ordinating any support for the LACs that is necessary within School;
- Ensuring confidentiality for individual pupils, sharing personal information on a need to know basis;
- Encouraging LACs to join in extra-curricular activities and out of School learning;
- Ensuring, as far as possible, attendance at planning and review meetings;
- Acting as an advisor to staff and Governors, raising their awareness of the needs of LACs;
- Setting up timely meetings with relevant parties where the pupil is experiencing difficulties in School or is at risk of exclusion;
- Ensuring the speedy transfer of information between individuals, agencies and - if the pupil changes school - to a new school;
- Being pro-active in supporting transition and planning when moving to a new phase in education;
- Tracking academic progress and target support appropriately;
- Promoting inclusion in all areas of School life;
- Being aware that 60% of LACs say they are bullied, so will actively monitor and prevent bullying in School by raising awareness through the School's anti-bullying policy;

- Ensuring that the audit on attendance and numbers and any other relevant information is returned to the Social Workers, parents and/or 'Virtual School Head' as necessary and every term as a minimum (where the number of LACs on the School roll is greater than zero in that term).

#### **6.4 Responsibilities of all staff**

All staff of the School will:

- Have high aspirations for the educational and personal achievement of LACs, as for all pupils.
- Maintain LACs's confidentiality and ensure they are supported sensitively.
- Respond positively to a pupil's request to be the named member of staff whom they can talk to when they feel it is necessary.
- Respond promptly to the Designated Teacher's requests for information.
- Work to enable LACs to achieve stability and success within School.
- Promote the self-esteem of all LACs.
- Have an understanding of the key issues that affect the learning of LACs.
- Be aware that 60% of LACs say they are bullied so work to prevent bullying in line with the School's policy.
- Develop the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority.
- Read, record and act upon, as necessary, all relevant information shared with them in relation to LACs, including:
  - up-to-date assessment information from the relevant local authority;
  - the most recent care plan and contact arrangements with parents and delegated authority to carers;
  - information available to the Designated Teacher.

#### **6.4 Care Leavers**

In some cases, young people cease to be looked after and become care leavers in which case, the DSL will hold the details of the local authority personal advisor appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

## Appendix 8: Terms of Reference for the Annual Safeguarding Review

### 1 Purpose

- 1.1 The Nominated Safeguarding Governors visit the School at least once a term and undertake the following reviews in each term:

Autumn	Spring	Summer (Annual Safeguarding Review)
HR Files (as many September starters) and SCR  DSL discussion  Review Complaints register and Bullying and Sanctions register	Junior School visit & discussion with head of Junior School  CPOMS audit  DSL discussion	HR Files and SCR  Section 11 report discussion with DSL

- 1.2 The Annual Safeguarding Review is commissioned by the Governing Body and undertaken by the Designated Safeguarding Lead with input from the Nominated Safeguarding Governors (and approved by them) every Summer Term. The Review is then presented to the Governing Body at the Board Meeting in the Summer Term.
- 1.3 The Annual Safeguarding Review will consist of a safeguarding report prepared by the DSL and Nominated Safeguarding Governors (on a similar basis as the other termly reports) and will include:
- (1) a summary of the main safeguarding issues dealt with by the school in the previous 12 months; and
  - (2) a copy of the S11 Report presented to the Local Authority.

## Appendix 9: Job Description: Nominated Safeguarding Governor (as set out in Governor Handbook)

- 1 The main role and duties of the Nominated Safeguarding Governor on behalf of the Governing Body (which retains overall responsibility) are to:
  - 1.1 champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School;
  - 1.2 encourage other members of the Governing Body to develop their understanding of the Governing Body's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties;
  - 1.3 ensure that the Governing Body puts in place a suitable safeguarding and child protection policy (Safeguarding (Child Protection) Policy) and associated policies procedures which have proper regard to prevailing regulations, guidance, standards and advice;
  - 1.4 be familiar with the Local Safeguarding Children's Partnership guidance and procedures relating to safeguarding and child protection and associated issues, contributing to inter-agency working;
  - 1.5 contribute to ensuring any deficiencies in the School's safeguarding practices brought to Governors' attention from any source are investigated and addressed;
  - 1.6 meet regularly with the School's Designated Safeguarding Lead in order to monitor the effectiveness of the School's Safeguarding (Child Protection) Policy and procedures including recruitment procedures and the implementation of these across the School. It is recommended that this is at least a termly meeting and should cover all items listed in the draft schedule at the end of this Job Description;
  - 1.7 ensure that the Governing Body receives a report on the implementation of the School's Safeguarding (Child Protection) Policy and procedures to support the full Governing Body's review of safeguarding in the School at least annually (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance;
  - 1.8 alert the Governing Body to any incident which the Nominated Safeguarding Governor regards as a substantiated safeguarding incident;
  - 1.9 ensure that the Designated Safeguarding Lead is part of the School's senior management team, and has sufficient time and resources at their disposal to carry out their duties effectively;
  - 1.10 ensure that a Deputy Designated Safeguarding Lead is identified;
  - 1.11 ensure that the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) receive appropriate training at least every two years;
  - 1.12 ensure that arrangements are in place for the inclusion of child protection training on the School's procedures in an induction programme for all people working in the School, no matter for how long, nor the status of that individual;
  - 1.13 ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers;
  - 1.14 review the School's Single Central Register on at least an annual basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies;

- 1.15 undertake an annual spot check of staff awareness and understanding of safeguarding procedures;
  - 1.16 be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work;
  - 1.17 ensure that the Governing Body carries out regular risk assessments of factors particular to the School which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyberbullying; and
  - 1.18 both provide to, and seek from, the local authority and other relevant agencies information about how the Governing Body's duties in respect of safeguarding and child protection have been discharged, where appropriate or requested.
- 2 The identity of and contact details for the Nominated Safeguarding Governor, together with an outline of his / her duties, will be publicised widely within the School community to ensure that pupils, parents, staff and Governors understand the purpose and importance of the role.
  - 3 To the extent that the role and duties of the Nominated Safeguarding Governor conflict with those assumed by others within the School, including the Chair of Governors, the Governing Body will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties. This may include amendments to the Safeguarding (Child Protection) Policy, the School's constitutional documents and/or other governance arrangements applicable to the School.
  - 4 The Nominated Safeguarding Governor will undertake appropriate training in accordance with the Local Safeguarding Children Partnership's recommendations.

## Appendix 10: LEH Safeguarding Concern Report Form

### LEH Safeguarding and Child Protection Report of a Concern

Name of pupil:			
Form:		Name of referrer:	
<p>Details of concern:</p> <ul style="list-style-type: none"> <li>• <i>Are you passing on your own concern, a disclosure or suspicions from a third party, or a disclosure made directly to you by the pupil?</i></li> <li>• <i>What has prompted this concern? Include dates and times of any specific incidents, or of the disclosure.</i></li> <li>• <i>Are there physical injuries, any behavioural or indirect signs?</i></li> <li>• <i>Has this happened before? Was the previous incident reported?</i></li> <li>• <i>If the pupil made a disclosure, where were you; who else was there; what did the pupil say or do; what did you say? Use the exact words as far as possible.</i></li> <li>• <i>What action have you taken e.g. speaking to pupil, parents, colleagues?</i></li> </ul>			
Reported to:		Date:	
Signed:			



**Appendix 11: Visiting Speaker Form**

**VISITING SPEAKER FORM**

LEH is required to maintain a register of all Visiting Speakers i.e. visitors to the School who give talks and seminars etc. We need to ensure all speakers are suitable and appropriately supervised.

Members of staff organising the visit must complete and submit this form with all the details set out below for **every visiting speaker** with this DAF. It should be passed to Amanda Poyner as DSL.

Staff responsible for a Visiting Speaker are reminded that all visitors to the School must be:

- Signed in and given a Visitors Badge at Reception on arrival and their ID checked;
- Collected from Reception by a member of staff;
- Supervised at all times while on the School site by the member of staff responsible for the visit. In particular, Visiting Speakers must never be placed in a position of being alone with pupils.

**Name of Visiting Speaker:** .....

**Organisation they work for or are representing:** .....

**Subject/title of the talk/lecture/workshop:** .....

**Member of staff responsible for visit:** .....

**Date of Visit:** .....

**Timings of Visit:** .....

**Year Group(s)/Class(es) (and any external attendees e.g. Hampton):**  
.....

**To confirm, the Visiting Speaker will be accompanied at all times by a member of staff and will not be placed in a situation where he/she is in a one-to-one situation with a pupil.**

**Signed:** .....

**Dated:** .....

**To be completed by JAP as DSL:**

Approval is given for the talk/lecture: Yes/No

A risk assessment is required? Yes/No

**Signed:** .....

**Dated:** .....

[THIS FORM WILL BE RETAINED BY THE DSL]

**VISITING SPEAKER RISK ASSESSMENT**

**(to be completed when DSL has any concerns about the individual or topic to be discussed in School as recorded on the Visiting Speaker Form)**

The risk assessment will be completed by DSL together with the person inviting the speaker to the School. This process should have regard to the Prevent duty when making assessments of risk.

Further details of the activity to be carried out during visit: .....

Has the speaker attended before and if so, were there any issues?  
.....

Will this be a one-off visit?.....

Was the Visiting Speaker recommended (give detail of how/who)?.....

Has a *Google* search been completed without raising concerns?.....

Has anyone at the School heard them speak/met them before? .....

Has the exact nature of the content/topic been confirmed with the visitor? .....

Has the School's Prevent Duty been explained to the speaker? .....

**Risk Assessment:**

**Clarify perceived level of risk: Very Low/Low/Medium/High**

**Give Reasons for Risk Conclusion:.....**

**Detail any additional risk management measures additional to standard visitor procedures:  
.....**

**Signed: (event organiser).....**

**Date:.....**

**Signed: (DSL) .....**

**Date:.....**

**[THIS FORM ONCE COMPLETED WILL BE STORED WITH THE SINGLE CENTRAL REGISTER (SO THE SEARCHES CAN BE RECORDED)]**

**Appendix 12: Part 1 and Annex B of Keeping Children Safe in Education (September 2021)**

[CLICK HERE TO OPEN PART 1 OF KCSIE \(SEPTEMBER 2021\)](#)