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St Paul's Cathedral School

Safeguarding (Child Protection) Policy and Procedures

September 2021

(Reviewed annually)

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St Paul's Cathedral School: Safeguarding Contact Information

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Contents

AIMS & PRINCIPLES	4
Safeguarding (Child Protection) Policy and Procedures.....	5
1 Introduction	5
2 Our Aims	6
3 The Role of the Governing Body.....	7
4 Staff Roles and Responsibilities	9
5 Safer Recruitment Procedure	12
6 Procedure for dealing with a suspicion or concern about a child.....	14
7 What to do if a child discloses that s/he is being abused	16
8 Confidentiality	16
9 Procedure for dealing with Allegations of Abuse Against Another Child, a Member of Staff, Volunteer or the Head	16
10 Staff Training and Mutual Responsibilities.....	20
11 Record Keeping	21
12 Pupil Support.....	21
Child Protection Legislation and Guidance.....	24
Relevant Contacts.....	26
Types of abuse and neglect.....	27
<i>Pointers to the Possibility of Abuse</i>	28
Steps to be taken if a child is presumed missing.....	42
Steps to be taken when a child is missing from education	42
(unauthorised absence).....	42
Safeguarding Children in School - Dealing with Disclosure	43
Response to COVID-19	44
Appendix 9 – Record of Concern Form	47
Safeguarding Children and Young People	48
Safe Working Practice Agreement	48

AIMS & PRINCIPLES

St Paul's Cathedral School is a Christian, co-educational community which holds to the values of love, justice, tolerance, respect, honesty, service and trust in its life and practice, to promote positive relationships throughout the school community and where the safety, welfare and emotional well-being of each child is of the utmost importance.

The school aims to instil a love of learning through a broad curriculum. It aims to give each pupil the opportunity to develop intellectually, socially, personally, physically, culturally and spiritually. All pupils are encouraged to work to the best of their ability and to achieve standards of excellence in all of their endeavours.

Through the corporate life of the school, and through good pastoral care, the school encourages the independence of the individual as well as mutual responsibility. It aims to make its pupils aware of the wider community, espouses the democratic process and encourages a close working relationship with parents and guardians.

St Paul's Cathedral School

Safeguarding (Child Protection) Policy and Procedures

1 Introduction

- I.1 St Paul's Cathedral School recognises that all staff (including temporary staff, volunteers and governors) have a duty to protect the children in their care (including those in the Early Years Foundation Stage) from abuse, neglect and exploitation. Appropriate action will be taken to minimise risks. The School aims to create an ethos which empowers children, encourages the expression of their ideas, feelings and opinions, and treats them with respect. Staff will consider, at all times, what is in the best interests of the child.
- I.2 All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- I.3 The School is mindful of the legislation and guidance which is designed to safeguard the welfare of children. Appendix I lists the legislation and guidance which pertains currently.
- I.4 Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. The document "Keeping Children Safe in Education" (KCSIE) (September 2022) defines abuse in four categories:
- physical abuse;
 - emotional abuse;
 - sexual abuse and
 - neglect.

These apply to all children and young people under the age of 18. Detailed explanations of these definitions are contained in Appendix 2.

- I.5 This safeguarding policy is made available to parents on request and can be found on the school's website.
- I.6 This policy should be read in conjunction with these other policies:
- Anti-bullying policy
 - Educational Visits Policy
 - ICT and use of electronic equipment policy (pupils)
 - Staff code of conduct
 - Use of email systems and internet policy (staff)
 - Social networking policy (staff)
 - Safe Working Practice Agreement (staff and volunteers)
 - Whistleblowing Policy

- Recruitment Policy
- St Paul's Cathedral Safeguarding Policy
- RSE Policy
- Missing Pupil Policy
- EYFS Policy on the use of mobile phones
- First Aid Policy

2 Our Aims

2.1 In order to create and maintain an environment which safeguards and promotes the welfare of children:

- We ensure safe recruitment practice in checking the suitability of staff, governors and volunteers to work with children;
- We raise awareness of child protection issues and equip children with the skills to keep themselves safe;
- We ensure children know that there are adults in the school and in the wider Cathedral community whom they can approach if they have worries, with whom they feel secure, are encouraged to talk, and are listened to;
- We provide access to external sources for support for children with concerns. We promote children's resilience to harm via the tutorial system and PSHEE curriculum;
- We ensure staff are alert to risks of abuse and indicators of harm;
- We ensure staff are alert to the threat of radicalisation and appropriately responsive in line with the Prevent Strategy
- We have a zero tolerance approach to child on child abuse and recognise that this could happen here
- We implement procedures to identify and report cases, or suspected cases, of abuse to the City of London Children's Services Team;
- We ensure the school follow the inter agency procedures established by the City and Hackney Safeguarding Children's Partnership (CHSCP) and set out in the City of London Threshold of Needs Document. https://www.chscp.org.uk/wp-content/uploads/2015/09/Thresholds-of-need-WEB-030915_Redacted.pdf
- We know how to find out who else is working with the child and when and how to share information and will work in partnership with all relevant agencies to the benefit of the child;
- We support pupils who have been abused in accordance with their agreed protection plan;
- We establish a safe environment in which children can learn and develop;
- We recognise that parents have a right to confidentiality but, should the need arise, parents will be advised if information needs to be divulged to other people concerned with the child or family's welfare.

3 The Role of the Governing Body

3.1 The Governing Body is accountable for ensuring that the school has effective policies and procedures in accordance with legislation and guidance, and is accountable for monitoring the school's compliance. To demonstrate their compliance with this policy, members of the Governing Body have undergone DBS checks.

3.2 The Governing Body will ensure that:

- The school has a child protection policy and procedures in place, in line with current legislation and guidance, is in accordance with locally agreed inter-agency procedures and follows the guidelines of the City and Hackney Safeguarding Children Partnership;
- There is a designated governor for child protection (see 3.4);
- The school has a senior member of the leadership team, who is the Designated Safeguarding Lead (DSL) for child protection, who has undertaken basic and further training, including refresher training every year;
- All staff know the name of the senior person responsible for child protection and are aware of that person's role;
- There is a job description for the DSL and that he or she has sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively.
- All staff (including temporary staff, senior boarders and volunteers) are made aware of the school's arrangements for child protection, and their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the designated senior person responsible for child protection;
- Mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of KCSIE and Annex B
- Ensure that all staff who do not work directly with children read Annex A (a condensed version of KCSIE)
- Written records of concerns about children are kept securely, away from the main pupil file in a locked location and that such records are kept even if there is no need to refer the matter immediately;
- The school always follows safe recruitment procedures, including DBS checks;

- There are procedures for dealing with allegations against a member of staff, volunteers or the Head in line with locally agreed inter-agency procedures (in line with the City and Hackney Safeguarding Children Partnership's requirements);
- Staff and the Head have undertaken appropriate training to assure their competent execution of their child protection responsibilities (updated at least every 2 years) and receive safeguarding updates at least annually;
- It has considered how children may be taught about safeguarding, including online, through the curriculum and PSHEE and provision is made for teaching children to keep themselves safe.
- Children are safeguarded from potentially harmful and inappropriate online material by ensuring appropriate filters and monitoring systems are in place (see Annex C of KCSIE).
- Parents have an understanding of the responsibility for child protection placed on the staff and school;
- It recognises the importance of information sharing between professionals and local agencies and that the school develops effective links with the relevant agencies and co-operates as required with their enquiries regarding child protection matters in line with locally-agreed inter-agency procedures.
- Ensure that when the School is hiring or renting out School facilities/premises to organisations or individuals (for example community groups) it checks that the service providers have appropriate arrangements in place to keep children safe.

3.3 The Governing Body will:

- Review the school's child protection policies annually, including an update and review of the effectiveness of procedures and their implementation.
- Receive a report annually (in June) from the DSL.
- Remedy any deficiencies or weaknesses in the school's arrangements for child protection without delay.
- Nominate a member of the governing body (usually the Chair) to liaise with relevant agencies in the event of an allegation against the Head Teacher or the DSL for child protection.
- Review its child protection policy and procedures annually and maintain information about them and the efficiency with which the above duties have been discharged.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2020, (including Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

3.4 The Designated Governor for child protection is The Revd Canon James Milne. The Designated Governor's function is to provide help and support to the DSL in the school and to liaise, as appropriate, with the Diocese and other agencies. The Designated Governor will meet with the DSL once a term. They will talk to members of staff across the school to check if they are aware of policies and procedures.

3.5 Other than the Designated Governor for child protection, Governors do not have a role with individual cases, except when exercising disciplinary functions in respect of allegations against staff. If there is an allegation against the Head Teacher, this would be dealt with by the Chair of Governors together with the other agencies involved in safeguarding children.

3.6 All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in school are robust and effective. All governors are asked to confirm they have read KCSiE on an annual basis.

4 Staff Roles and Responsibilities

4.1 School staff are in contact with children all day and are in a position to detect early indicators of possible abuse, including changes in children's behaviour or their failure to develop. All staff should be prepared to identify children who may benefit from early help.

All staff have a responsibility to:

- be aware that safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in school;
- be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL or DDSL if they have concerns about a child;
- raise immediately any concerns about the welfare of a child, including children who may be at risk from being drawn into terrorism, and report concerns or allegations of risk of harm to pupils;
- reassure victims of abuse that they will be taken seriously, supported and kept safe;
- understand the additional safeguarding vulnerabilities of learners with SEN and disabilities and how those barriers can be overcome;
- recognise that pupils with protected characteristics may be more at risk of harm;
- make a referral to children's social care and/or the police if a child is in immediate danger or is at risk of harm;
- contribute to the assessment of a child's needs;
- contribute to ongoing action to meet those needs.
- Read at least part one of KCSiE with Annex A and Annex B for school leaders and those who work directly with children

- 4.2 The school has a Designated Safeguarding Lead for child protection who takes lead responsibility for dealing with child protection concerns.
- 4.3 All staff can also raise concerns directly with any local authority safeguarding partnership. For children residing in the City of London this is the City of London Corporation Children and Families team. See Appendix 3 for details. Staff with concerns including support and advice about extremism may also call the local police on 101 (non-emergency number) or the DfE dedicated telephone number or mailbox for non-emergency advice: 0207 340 7264; counter-extremism@education.gsi.gov.uk
- 4.4 All staff have a legal obligation to report to the police any cases of FGM they discover. They should discuss the case with the DSL who will involve children's services.
- 4.5 All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and that such concerns will be taken seriously by the senior management team. Where a staff member feels unable to raise an issue with the school or feels that their genuine concern is not being addressed, they should use the Whistleblowing Policy, or call the NSPCC whistleblowing helpline (0800 028 0285 – 8.00am – 8.00pm Monday – Friday) or email help@nspcc.org.uk
- 4.6 The DSL for child protection at St Paul's Cathedral School is the Deputy Head, Mrs Caroline Heylen, who is also the designated person to take lead responsibility for safeguarding children within the EYFS setting and liaising with local statutory children's agencies as appropriate. The DSL is assisted by three Deputy Designated Safeguarding Leads (DDSL). The DDSLs for child protection are: Mr Joe Gorman, Miss Madeleine Smyth, and Miss Julie Schindler. All members of the safeguarding team receive training in Safeguarding Children on a regular and systematic basis. The DSL has also received training in Safer Recruitment.
- 4.7 The DSL's broad areas of responsibility are:
- To refer allegations of suspected abuse or child protection concerns to the City of London Children's Services Team. Such a referral or referrals must be made within 24 hours (in writing or with written confirmation of a telephoned referral) to the City of London Children's Services Team to carry out child protection investigations rather than internal investigations by the school;
 - To provide support, advice and expertise within St Paul's Cathedral School;
 - To decide whether to make a referral to City of London Children's Services Team or to the Police and to liaise with the City and Hackney

Safeguarding Children Partnership and other organisations when necessary;

- To attend relevant training in child protection, inter-agency working and training in the City of London and Hackney Safeguarding Children Partnership (CHSCP) approach to 'Prevent' duties provided by the local social services department or an external welfare agency acceptable to the local safeguarding children board with updates at least every two years;
- To ensure that all staff have access to and understand the school's Child Protection policy;
- To ensure that all staff and the Head have regular training to assure competence in child protection matters (at least every 2 years), 'Prevent' awareness, and online safety training, and to keep records detailing such training;
- To ensure that when KCSIE updates are released that all staff read and understand Part 1 and Annex A and Annex B. All staff need to confirm that they have done so;
- In addition, the DSL/DDSL disseminates to all staff via email, e-bulletins and staff briefings as required, safeguarding and child protection updates to provide staff with the relevant skills and knowledge to safeguard children effectively;
- To ensure that temporary and voluntary staff who work with children are made aware of the school's child protection arrangements.
- To keep written records of all concerns in respect of child protection in a locked location;
- To notify City of London Children's Services Team of any unexplained absence of more than two days for any child who is subject to a child protection plan;
- Where children leave the school, to ensure their child protection plan is copied for the new establishment as soon as possible but transferred separately from the main pupil file;
- If a child leaves and the new school is not known, to alert the LEA so that these children can be included on the database for lost pupils;
- To make an annual child protection report to the Governing Body in consultation with the designated governor for child protection;
- To ensure the school's Safeguarding/Child Protection policy is reviewed annually, and updated as necessary and to work with the Governing Body regarding this, including a review of associated policies such as anti-bullying and policies applicable to boarders, such as steps to be taken if a child is presumed missing;
- To ensure parents see a copy of the Child Protection policy which alerts them to the fact that referrals may be made and the role of the School in this.
- To liaise closely with the cathedral staff responsible for rehearsals and performances with the choristers and probationers to safeguard their general well-being.

- To take responsibility for on-line safety and liaise with the Head of ICT and the Head of PSHE with regards to the teaching of online safety to pupils and for training staff in online safety
- 4.8 The School Nurse may provide advice and guidance on appropriate matters (e.g. health or injury to a child) to the Designated Safeguarding Lead.
- 4.9 All newly appointed staff and volunteers are required to be trained in the school's child protection policy as part of their induction as soon as they start working at the school. The training will include:
- the school's child protection policy;
 - the staff behaviour policy and code of conduct including the whistleblowing procedure and online safety;
 - the identity of the designated person and their assistants;
 - a copy of Part I of KCSIE including Annex B
 - Prevent Training
 - Online Safety Training
- 4.10 As St Paul's Cathedral School is within the City of London, the policy and practice of the school is reviewed by the City of London Children's Services.
- 4.11 Staff in the EYFS setting and across the Pre-Prep department have a responsibility to ensure they adhere to the EYFS policy on mobile phones and cameras. This includes not using personal mobile phones, cameras, apple watches and video recorders in the presence of children either on school premises or when on outings and not using mobile phones in any teaching area within the setting or within the bathroom area.
- 4.12 For student or trainee teacher placements, the tertiary education provider must provide written confirmation that they have carried out all safeguarding checks regarding the individual, before the student or trainee teacher can start a placement at the school.
- 5 Safer Recruitment Procedure
- 5.1 The school recognises that a structured approach to recruitment, which includes appointing staff to specific job roles which have a job description, is an important part of ensuring safe recruitment.
- 5.2 Job descriptions are provided which include reference to procedures relating to the protection of children, the duty to prevent child abuse, and the action to be taken if abuse is discovered or disclosed; they also set out clearly to whom members of staff are accountable and those whose work they are

responsible for supervising as well as the name and role of the Designated Safeguarding Lead in the school.

5.3 The school will ensure that applicants for any post provide the following documented information when applying for a post:

- full name (including any changes of name), current and recent addresses and date of birth
- details of previous experience, voluntary or paid, of working with children
- permission to contact, in writing and in person, two persons who have experience of their work or contact with children and who may be asked for a reference.

5.4 During the interview process interviewees will be asked specifically about their experience of work with children.

Before appointment of the individual to a post the school will:

- obtain two references from persons who have experience of the applicant's paid or voluntary work with children and have specifically addressed this topic in giving a reference;
- make no appointment prior to receipt of a satisfactory Enhanced DBS check.
- make no appointment prior to checking prohibition from teaching orders if the individual is to carry out teaching work.
- make no appointment prior to checking prohibition from management directions if the individual is to be appointed to a management position.

5.5 The school will make a barred list check and an overseas check if applicable.

5.6 The school has registered with an agency so that it can access the Disclosure service in relation to all paid staff (full, part time and temporary) and volunteers who have regular unsupervised access to children. All school staff must have a DBS check. Disclosure arrangements for the School are managed by the Bursar and the Designated Safeguarding Lead. Disclosure information is kept securely by the Designated Person or the Bursar.

5.7 As part of the Disclosure process, the Bursar will establish the identity of the applicant by reference to a range of appropriate documents (full birth certificate, passport, or photo card driving licence and an item such as a utility

bill which shows the applicant's name and address.) Where appropriate, change of name documentation should also be verified.

- 5.8 All newly appointed staff will be asked to fill in a self-declaration form as required under legislation for those who work or who come into contact with children in the Early Years Foundation Stage. (Supplementary advice to KCSIE)
- 5.9 New staff will be required to make a self-declaration of medical fitness.
- 5.10 Photocopies of all documents will be kept confidentially on the individual's personnel file. A record of evidence to show that supply staff and volunteers have been checked is also kept.
- 5.11 The Bursar will obtain assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site.
- 5.12 Low level concerns regarding supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified.
- 5.13 The school will ensure that any visiting speakers are suitable and supervised.

6 Procedure for dealing with a suspicion or concern about a child

If a staff member or volunteer has a suspicion or concern about a child they should:

- Bring this to the attention of the Designated Safeguarding Lead immediately. The Head should be informed. In the absence of the Head, the Chair of Governors should be informed. In the absence of the Designated Person or the Assistant Designated Person, the staff member or volunteer should contact the most senior member of staff on site and seek their advice.
- Staff may also raise their concern directly with the Children's Social Care Services – see 4.3 and Appendix 3.
- Take advice about what action needs to be taken to ensure the child is safe. This may mean seeking medical attention for the child.
- In cases of serious harm, or on suspicion that a crime may have been committed, inform the police from the outset and inform the DSL that you have done so.
- Record all concerns and actions taken. This should include dates, times, what was observed and what was said, including the actual words said by the child. If there is an injury this should be noted on a body map form.

What action has been taken should be clearly indicated and the form signed, dated and timed by the Designated Person.

Where concerns are such that they may indicate a child is suffering or likely to suffer significant harm, the Designated Person shall report these to the City of London Children's Services Duty Officer immediately. Where it is clear that a child is in need of additional support from one or more agencies, an inter-agency assessment should be set up using local processes.

Parents may be notified to both share and clarify information, unless it is felt this could place a child at risk or if the concerns are of sexual abuse where advice must be sought and advice taken from the duty social worker at City of London Children's Services. See Appendix 3 for contact details.

All staff will be trained so that they are alert to signs and symptoms which are cause for concern. (Appendix 4 gives details.) This includes being aware of child sexual exploitation, and child criminal exploitation further information on which can be found on pages 13 – 14 KCSIE 2022 Part 1 Female Genital Mutilation, including breast flattening, any concerns about children who run away or go missing and the vulnerability of 'Looked After Children', domestic abuse, honour-based violence and forced marriage.

All staff should be aware safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults, consensual and non-consensual sharing of nude or semi-nude images and sexual harassment, including upskirting, as well as behaviour involving initiation or other 'rituals'.

All staff should understand that the school has a zero tolerance approach to child on child abuse and, that even if there are no reports of child on child abuse in the school it does not mean it is not happening, it may just not be being reported. Staff should adopt an attitude of it could happen here and should always challenge inappropriate behaviours never dismissing it as 'just banter'.

All staff should understand the contextual issues of safeguarding. This is done by considering the wider environmental factors affecting the child's life that may pose a threat or risk to their safety and/or welfare.

All staff should foster a greater awareness of the mental wellbeing of their pupils and will receive training to be better equipped to deal with the challenges in this field.

Types of abuse are outlined in Appendix 4 of this document and on pages 11 to 16 of KCSIE (September 2022). All staff will be made aware of the school's policy in respect of finding/reporting a missing child (Appendix 5.)

The school will report to the Local Authority pupils who have more than ten days of unauthorised absence (other than for reasons of sickness or leave of absence), pupils who fail to attend on a regular basis and any pupil who is deleted from the attendance register when the next school is not known.

7 What to do if a child discloses that s/he is being abused

- 7.1 When a child makes an allegation of abuse, s/he must be taken seriously. Even if the allegation seems improbable, it must be treated seriously.
- 7.2 The child should be reassured that they have done the right thing to talk and, if possible, his or her words should be noted, as accurately as possible. The note should be timed, dated and signed.
- 7.3 All staff will be trained in the use of appropriate questioning techniques. It is important not to use leading questions. Open-ended questions should be used when talking to the child. It is important that the child is not questioned other than to gain basic information: an investigation will not be undertaken. (Guidance in note form of how to respond is shown in Appendix 6.)
- 7.4 Where a child discloses they are being abused, whether by one or more children, the Designated Person should be notified. He will then notify the City of London Children's Services. Reference should also be made to the school's anti-bullying procedure, as appropriate.

8 Confidentiality

- 8.1 Sometimes children will tell an adult they trust that they are being abused, but will ask that no-one else is told. If that happens it must be explained that certain people must be told about the child's disclosure but this will be confidential and not mentioned to anyone other than staff designated for child protection concerns and City of London Children's Services Team.
- 8.2 It is very important that anyone who suspects a case of child abuse maintains confidentiality at all times. Other members of staff will be informed on a need-to-know basis.
- 8.3 The duty to share relevant information to keep children safe overrides all other privacy related legislation.

9 Procedure for dealing with Allegations of Abuse Against Another Child, a Member of Staff, Volunteer or the Head

- 9.1 The school recognises its dual responsibility: to protect the wellbeing of children and to support its staff by fostering mutual confidence and trust. Any allegation will be dealt with sensitively, straight away and as confidentially as possible.

- 9.2 Staff should recognise that children are capable of abusing their peers. Abuse can take place between children. This can occur when there is a large difference in power (size, ability, development) or if the perpetrator has repeatedly tried to harm one or more other children. Care and consideration must be taken to ensure that abuse is not incorrectly identified as banter or teasing. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”.
- 9.3 Any allegation of abuse against another child must be reported immediately to the Designated Person and the Head must be informed (or in his absence the Chair of Governors who will usually consult the Designated Person on the Governing Body) and will be treated very seriously.
- 9.4 Any allegation against a member of staff, supply teacher, volunteer, a member of the Cathedral community or the designated person must be reported to the Head who will refer on to the Local Authority Designated Officer (LADO). Low level concerns about a staff member should also be reported to the DSL and the Head. If there are concerns about a DSL, this should be reported to the Head. Staff should also self-refer to the DSL and the Head if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards. Low level concerns will be recorded by the Head and will include details of the concern, how the concern arose and the actions taken. All allegations against staff members or volunteers will be dealt with under the City and Hackney Safeguarding Children Partnership’s Procedures.
- 9.5 If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors *without* notifying the Head first.
- 9.6 The London Child Protection Procedures apply if there is an allegation of concern that any person who works with children in connection with their employment or voluntary activity has:
- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against a child;
 - behaved towards a child or children in a way that indicates they are unsuitable to work with children.
- 9.7 All allegations should be referred to the LADO for advice before any investigation takes place.
- 9.8 In case of serious harm, or on suspicion that a crime may have been committed, the police should be informed from the outset.
- 9.9 A staff member may be suspended until the matter has been fully investigated, although such suspension is not automatic. Suspension is a neutral act and the suspension will be on full pay. If an allegation is made against the Head or the

Designated Person, the Designated Governor and the Chair of Governors will become involved.

- 9.10 The school is bound by a requirement to notify the Disclosure and Barring Service (DBS) within one month of any person (whether employed, contracted, a volunteer or student) leaving the school whose services are no longer used because he or she is considered unsuitable to work with children; the DBS address for referrals is: P.O. Box 181, Darlington DL1 9FA (tel: 01325 953795) This requirement remains if a member of staff resigns before the completion of a disciplinary investigation but in the event that a determination to dismiss would have been the likely outcome.
- 9.11 The school will consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed and a prohibition order may be appropriate. This requirement remains if a member of staff resigns before the completion of a disciplinary investigation but in the event that a determination to dismiss would have been the likely outcome.
- 9.12 The school will undertake to make arrangements for alternative accommodation away from children in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.
- 9.13 Members of staff should be aware of their vulnerability and should do their utmost to prevent misunderstanding. All Staff, even if they are non-residential, should be familiar with the School's Code of Conduct guidelines for Residential staff and the general Code of Conduct for Staff (referenced in the Staff Handbook). This is particularly important for staff accompanying residential trips.
- 9.14 If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine whether any improvements to be made to the school's procedures or practice to help prevent any similar events in the future.

9.15 Low Level Concerns

A Low-Level Concern is any concern – no matter how small, even if no more than a 'nagging doubt' – that any member of staff may have acted in a manner which:

- does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- is not consistent with an organisation's Code of Conduct and values
- undermines trust in expected behaviours
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- shouting at children
- using inappropriate, sexualized, intimidating or offensive language
- humiliating pupils

To help prevent low-level concerns (LLC), staff codes of conduct, behaviour policies and safeguarding policies and procedures should be implemented effectively and appropriate action should be taken to deal with any concern. Staff should be interpreted very widely to mean anyone associated with the organisation.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern that determination should be made by the Safeguarding Lead or Headteacher.

Sharing concerns Low-level concerns should be reported to the DSL or DDSL. The Safeguarding Lead should share the low level concern immediately with the headteacher. If there are concerns about a DSL, these should be reported to the headmaster.

The Head will be the ultimate decision maker in respect of all low-level concerns, although depending on the nature of some low-level concerns, the Head may wish to consult with the DSL when making decisions on further actions.

The school aims to create an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted or they have behaved in a way that falls below professional standards.

Recording concerns:

The headmaster keeps a written record of concerns. Records should include the details of the concern, how the concern arose and the actions taken. Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken.

When reviewing patterns of behaviour the school must consider if any wider cultural issues in school contributed to or enabled the behaviour to occur and if so whether further training or a revision of policies is required.

10 Staff Training and Mutual Responsibilities

10.1 It is recognised that this is a highly sensitive and difficult area of work which few teachers will have experienced previously. Whilst it is the responsibility of each member of staff to raise his/her awareness in matters of child abuse, the school also recognises its responsibilities.

10.2 The school has a responsibility:

- to provide staff development workshops on child protection at the beginning of each year;
- to ensure all staff, including temporary staff and volunteers are provided with induction training that includes:
 - the school's child protection policy;
 - the staff behaviour policy and code of conduct including the whistleblowing procedure;
 - the identity of the Designated Person and their assistants;
 - a copy of Part I of KCSIE including Annex B
 - Prevent Training
 - Online Safety Training
- to ensure the Designated Person and their deputies receives updated child protection training every year;
- to invite other professionals to speak to staff on matters of child abuse;
- to send staff on courses as available;
- to make available to all staff the London Safeguarding Children Procedures which are available from the Designated Safeguarding Lead;
- to remind staff that if they raise legitimate safeguarding concerns under the school's 'Whistleblowing' procedure, including the possibility of raising such concerns or allegations with Ofsted, this will be regarded as a 'Protected Disclosure' for which there will be no retribution nor disciplinary action if the Disclosure is made in good faith.

11 Record Keeping

- 11.1 All concerns relating to child protection will be recorded and these notes will be retained in a separate file kept securely by the Designated Safeguarding Lead. Information will be recorded to provide a clear and comprehensive summary of the concern with regard to facts, timed and dated observations, objective descriptions of the child's behaviour/appearance, without comment or interpretation. Where possible the exact words spoken by the child will be recorded. Details of how the concern was followed up and resolved with a note of any action taken, decisions reached and the outcome. All notes will be dated, timed and signed by the maker of the record. (Appendix 9 – Record of Concern Form).
- 11.2 The Designated Person will review these records regularly to see if there are any patterns of concern about a child's welfare.
- 11.3 The Designated Person will produce an anonymised annual report to the Governing Body.

12 Pupil Support

- 12.1 We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn.
- 12.2 Schools play an important role in supporting the mental health and wellbeing of pupils. All staff should also 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

The School refers to Mental health and behaviour in schools guidance:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

The School refers to Promoting children and young people's emotional health and wellbeing guidance:

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

As a school we encourage and are alert to the benefits of early intervention, mentoring, vertical tutor groups, form time and learning support and where appropriate, the use external specialist support for individual pupils. Staff, in consultation with parents, may also make a referral to Child and Adolescent Mental Health Services (CAMHS).

12.3 Overseas Pupils

Where pupils come from overseas we follow the government guidance found in

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/939471/Student_Sponsor_Guidance_-_Doc_2_-_Sponsorship_Duties_2020-12.pdf

12.4 The school will endeavour to support the pupil through:

- the content of the curriculum including the PSHE curriculum.
- the school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- the school discipline and rewards policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred.
- the school's anti-bullying procedure which is contained in the school's handbook.
- access to a publicised independent "listening ear" and the readily available contact number for Childline
- the school's formal tutorial system
- liaison with other agencies that support the pupil
- ensuring that, where a pupil subject to a child protection plan leaves, their information is transferred (under separate cover) to the new school immediately and that the child's social worker is informed.
- creating an atmosphere in which children's views can be expressed, listened and responded to.

This document is accurate as at May 2023 following material change inspection on 22 May 2023 and will be reviewed annually by the Governing Body in the autumn term 2023:

Reviewed October 2014

Reviewed February 2015

Updated September 2015

Updated October 2015

Updated February 2016

Updated July 2016

Revised and Updated September 2016

Updated May 2017

Updated September 2018

Updated November 2018

Updated June 2019

Updated October 2019

Updated September 2020

Reviewed March 2021

Revised September 2021

Updated March 2022

Revised September 2022

Revised May 2023

Robert Temmink

Chair of Governors

Reverend Canon James Milne

Designated Governor for Child Protection

Child Protection Legislation and Guidance

- The Children's Act 1989 and 2004
- Working Together to Safeguard Children (July 2018 and updates, February 2019))
- Keeping Children Safe in Education (September 2022)
- Prevent Duty (2021)
- The Education Act (2002)
- London Child Protection Procedures 2021 (City and Hackney Safeguarding Children Partnership)
- National Minimum Standards for Boarding schools (updated September 2022)
- Education (Independent School Standards) (England) Regulations 2014
- Statutory Framework for the Early Years Foundation Stage
- Disqualification under the Childcare Act (Updated August 2018)
- Disqualification by Association (September 2018)
- What to do if you are worried a child is being abused (March 2015)

- Relationship Education, Relationship and Sex Education (RSE) and Health Education (2019)

Appendix 2

Keeping Children Safe in Education: Statutory guidance for schools and colleges (2022)

This document can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf

End of Appendix 2

Relevant Contacts

City of London Children and Families Team – Contact Details

Children and Families Team : Duty worker 020 7332 3621 (9.00am- 5.00pm, Mon – Fri)

Email: children.duty@cityoflondon.gov.uk

Secure email: Children.Duty@cityoflondon.cjsm.net

Out of hours: 020 8356 2710 (5.00pm – 9.00am)

Email: emergency.duty@hackney.gov.uk

Further Information can be found at:

<https://chscp.org.uk/worried-about-a-child/>

Quality Assurance Manager and Local Authority Designated Officer (LADO) – Pat Dixon 020 7332 3621

End of Appendix 3

Types of abuse and neglect.

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

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of their school policy and procedures for dealing with it.

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

Pointers to the Possibility of Abuse

1. Physical Abuse

The most common examples are:

- **Bruises**

In or around the mouth

Fingertip bruising on arms, chest or face indicating tight gripping or shaking

Bruises of different colours indicating injuries of different ages

Two simultaneous black eyes without bruising to the forehead

Bruising showing the marks of a belt or implement or a hand print

Bruising or tears around the earlobes

Bruising to the head or soft tissue areas of the body

- **Bites**

Human bite marks are oval or crescent shaped and can leave a clear impression of teeth

- **Burns and Scalds**

Burns with a clear outline are suspicious

Circular burns from cigarettes

Linear burns from hot metal rods or electric elements

Burns of a uniform depth over a large area

Friction burns from being pulled across a floor

Scalds producing a waterline from immersion or pouring of hot liquid

Old scars indicating previous burns

- **Fractures**

Any fracture in a child under 1 year old is suspicious

Any skull fracture in the first three years is suspicious

- **Female Genital Mutilation**

This is illegal in the UK and is regarded as abusive. There is further information on page 9 of Part 1 of KCSIE (2020)

2. Emotional Abuse

This is difficult to identify. It is the result of ill treatment in the form of coldness, hostility and rejection; constant denigration or seriously distorted emotional demands; extreme inconsistency of parenting. Some of the signs and symptoms are as follows:

- Low self-esteem
- Apathy
- Being fearful and withdrawn or displaying 'frozen watchfulness'
- Unduly aggressive behaviour
- Excessive clinging or attention seeking behaviour
- Constantly seeking to please
- Over-readiness to relate to anyone, even strangers

3. Sexual Abuse

Can be suspected based on physical signs, the child's behaviour or following a direct statement by the child. It is often investigated because of a combination of these signs:

- A level of sexual knowledge inappropriate to the child's age
- Sexually provocative relationships with adults
- Sexualised play with other children
- Self-harm, mutilation, or suicide attempts or threats
- Recurrent urinary tract infections
- Sudden onset of soiling and wetting
- Truancy, running away from home
- Uncharacteristic difficulty in learning, poor concentration
- Recurrent abdominal pain
- Promiscuity
- Requests for contraceptive or other sexual advice
- Severe sleep disturbance
- Change of eating habits
- Social isolation and withdrawal.

4. Neglect

This is difficult to identify but leads to physical and emotional harm of a child. The signs and symptoms include:

- Failure of a parent to provide adequate food, clothes, warmth, hygiene, medical care or supervision
- Failure of a child to grow within the normally expected pattern – they may show pallor, weight loss and signs of poor nutrition
- Failure of parents to provide adequate love and affection in a stimulating environment

- A child may look listless, apathetic or unresponsive with no apparent medical cause
- A child may be observed thriving when away from the home environment.

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5. Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

6. Children Missing Education (CME)

Parents have a duty to ensure that their children of compulsory school age are receiving suitable full-time education.

In accordance with DfE Children Missing Education (2016) the School ensures all pupils are placed on the admissions and attendance register and maintains these records thoroughly.

In addition to the School's own regular monitoring of school attendance, staff are also asked to be vigilant and raise any concerns they may have about repeated absence, with no satisfactory explanation, as a potential safeguarding issue and refer their concerns to the DSL/DDSL.

Staff are aware of procedures and responses for pupils who go missing from education (especially on repeat occasions) and know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

The School will inform the City of London Education Welfare officer of any pupil who fails to attend School regularly, or has been absent without an explanation or the School's permission for a continuous period of 10 days or more.

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

With the school's close proximity to the Cathedral the school receives updates and works closely with City of London Police to raise awareness of potential external

threats and staff are aware of how to call for help if people are seen loitering in the vicinity of the school.

Pupils are alerted to the dangers of engaging with unknown adults both on line and in person via the PSHE curriculum.

7. Children with Special Educational Needs and Disabilities (SEND)

The school recognises that additional barriers may exist when recognising abuse and neglect for this group of children. These may include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability
- children with SEND can be disproportionately impacted by situations like bullying without outwardly showing any signs
- communication barriers and difficulties in managing and reporting these barriers.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content

In order to overcome these additional barriers, the DSL/DDSL and Deputy Head Academic will work closely with the Head of Learning Support to develop appropriate resources and strategies to ensure any SEND pupils receive suitably differentiated materials to teach them about safeguarding, to promote effective communication between all staff the pupil has contact with, ensure SEND pupils have time and space and appropriate support to share their thoughts and feelings if any safeguarding concerns are raised.

8. Children who are Lesbian, Gay, Bi or Trans

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be exacerbated where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their worries or concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum. The school is aware of the range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

9. Children and the Court System

Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. They might be required to attend family court when child arrangements are being decided following parental separation which can be very stressful and entrench conflict in families.

The Government has issued two age appropriate guides (5-11-year olds and 12-17 year olds) to support children during this potentially stressful situation. These guides explain each step of the process:

<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

10. Children with family members in prison

The school recognises that when a parent is in prison, children and young people can feel isolated and ashamed. They may not know their family member is in prison having been told they are 'staying away'.

Children may have been told not to talk about it or may struggle to tell others what has happened and how they are feeling. Children may be fearful of telling others, of being ostracised, they may feel angry or confused.

11. County Lines

County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018).

County lines exploitation, like other forms of abuse and exploitation can:

- affect any child or young person (male or female) under the age of 18 years;

- still be exploitation even if the activity appears consensual;
- involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- involve modern slavery (child trafficking)
- be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Key to identifying potential involvement in county lines are missing episodes, where the victim may have been trafficked for the purpose of transporting drugs and referral via the National Referral Mechanism should be considered where County Lines or Modern Slavery involvement is suspected.

12. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorized as either ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). (KCSiE)

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones in inappropriate ways, such as upskirting. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying) or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Online abuse falls into four areas of risk:

- Content
- Contact
- Conduct
- Commerce

Staff and pupils receive regular training on Internet Safety via staff meetings, assemblies, PSHE lessons, in addition information sessions are run for parents.

13. Homelessness

Homelessness means not having a home. You can be homeless even if you have a roof over your head. You count as homeless if you are:

- Staying with friends or family
- Staying in a hostel, night shelter or B&B
- Squatting
- At risk of violence or abuse in your home
- Living in poor conditions that affect your health
- Living apart from your family because you don't have a place to live together

(Shelter 2019)

Being homeless can impact on many areas of a child's life:

- Tiredness
- Appearance
- Physical health
- Stress and anxiety
- Educational attainment

14. Radicalisation and Extremism

Children are vulnerable to extremist ideology and radicalisation. As part of the Counter Terrorism and Security Act (2015), schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

There is no single way of identifying if a child is susceptible to extremist ideologies and radicalization can occur through a number of different methods, which may include family, social media, the internet.

As with other safeguarding risks staff should remain alert to changes in a pupil's behaviour and speech which could indicate they are in need of protection.

Staff receive training in the Prevent Duty at induction and via Educare and updates at staff meetings. Where staff are concerned that pupils are developing extremist views or show signs of becoming radicalised, they should discuss this with the DSL/DDSL. The DSL or DDSL may make a referral via Channel to protect pupils identified as

vulnerable. A referral to Channel can also be made by anyone who is concerned about a pupil.

15. Sexual Violence and Sexual Harassment

The school recognises the importance of recognising and responding robustly to sexual violence and sexual harassment between children in school.

Sexual violence and sexual harassment :

- can be between two children, or a group of children
- Both sexes may be affected
- Children with SEND are likely to be more vulnerable

- Sexual violence refers to rape, assault by penetration or sexual assault
- Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of images or video (nude or semi-nude images) or making inappropriate sexual comments
- Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent

Support for the victim of sexual violence and sexual harassment should consider their age, the nature of the allegations and the risk of further abuse. Schools should be prepared to support a victim over a long period of time. Where the victim or perpetrator moves to another school it is important that the new establishment is made aware of any ongoing support needs. A school must ensure the victim is safeguarded, but still provide the perpetrator with an education and support as necessary. Support for the alleged perpetrator must also consider their age and the nature of the allegations. An alleged perpetrator may have unmet needs themselves.

Handling incidents involving sexual violence and/or sexual harassment There are four likely scenarios that the School will need to manage:

Internally For example, for one-off incidents of sexual harassment, the School may take the view that the pupils concerned are not in need of early help and or that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support. Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Requiring Early Help In line with the above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

Where Social Care will need to be informed and involved Where a child has been harmed, is at risk of harm, or is in immediate danger, schools should make a referral to local children's Social Care. At the point of referral schools 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, Social Care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Schools should not wait for the outcome (or even the start) of a Social Care investigation before protecting the victim and other children in the school.

Where a criminal offence is likely to have occurred and the Police will be needed Any report to the Police will generally be in parallel with a referral to children's Social Care (as above). Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the Police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the Police remains.

When to call the Police At this stage, the School will generally inform parents unless there are compelling reasons not to, for example, if informing a parent is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's Social Care and any appropriate specialist agencies. Please refer to page 110 (KCSIE 2021 for information regarding bail conditions). Please refer to pages 33-35 of the government guidance Sexual Violence and Sexual Harassment in schools and colleges). The DfE advice highlights best practice and cross references other advice, statutory guidance and the legal framework.

As a school we will:

- Not tolerate sexual violence and sexual harassment
- Never downplay such behaviours or accept them as 'just banter' or 'inevitable part of growing up' or refer to such behaviours as 'boys will be'

boys'. So doing would normalise inappropriate behaviours and discourage children from coming forward with their concerns

- Challenge inappropriate verbal behaviours such as sexist comments, taunting or innuendo
- Challenge inappropriate physical behaviours such as pulling down trousers, lifting up skirts, flicking bras, grabbing bottoms, breasts or genitalia
- Embed a strong pastoral system where children are aware of all the different routes open to them to raise issues. This may be through the form teacher, tutor, medical team, safeguarding team, worry boxes.
- Follow a clear RSE programme within the PSHE curriculum to include age appropriate content around; gender roles, consent, and healthy relationships
- Have clear systems in place to report allegations of sexual violence and sexual harassment
- At all times consider the best interests of all involved

16. Mental Health

Schools have an important role in supporting the mental health and wellbeing of pupils. At SPCS aim to promote positive mental health and wellbeing for our whole School community (pupils, staff and parents), and recognise how important mental health and emotional wellbeing is to our lives, in just the same way as physical health.

We recognise that children and young people's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. Alongside the form and tutor group system we have a designated mental health first aider and the services of the Chaplain who comes in once a week for 'chaplain chats'.

All children and young people will have varying mental health during their school career. However, some face significant life events which can seriously impact their emotional wellbeing and can include mental illness. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that all staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

All staff should be aware that deteriorating emotional wellbeing and escalation of mental health problems can, in some cases, be an indicator that there is a safeguarding concern, for example, a child has suffered or is at risk of suffering abuse, neglect, bullying/cyberbullying or exploitation.

Only appropriately trained health professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, with concerns reported to the DSL or DDSL.

The Department of Education has published advice and guidance on Promoting mental well-being and support in schools.

<https://www.gov.uk/guidance/mental-health-and-wellbeing-support-in-schools-and-colleges>

17. Child on Child Abuse

All staff should be aware that children can abuse other children (often referred to as child on child abuse). It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff understand that even if there are no reports in our school it does not mean it is not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child on child abuse they should speak to their DSL (or DDSL).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. While it is more likely that girls will be victims and boys perpetrators, all peer-on-peer abuse is unacceptable and will be taken seriously.

The school has a zero tolerance approach to peer on peer abuse. Addressing inappropriate behaviour (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.

All children are capable of abusing their peers. Child on child abuse is most likely to include, but may not be 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 semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities including harassment, abuse, or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff have an attitude that any of behaviours listed above 'could happen here'.

A whole school approach to preventive education ensures that the curriculum, school policies, pastoral support and whole school ethos complement each other to create an environment that helps to prevent negative behaviour.

Staff are aware of the important role they play in the early identification of possible child on child abuse within school and beyond and understand the policies and procedures in place to prevent and where necessary respond to pupils at risk.

Staff receive regular training on peer on peer abuse during Safeguarding updates and via online training from Educare. As part of this education, staff will challenge the attitudes that underlie such abuse (both inside and outside the classroom). Staff are alerted to the fact that certain groups of children, such as those with SEND, are more at risk from and vulnerable to peer on peer abuse, isolation or bullying (including prejudice-based bullying), than other children, and may not exhibit any outward signs of this abuse. Staff also recognise there may be additional barriers for children with SEND, such as communication, which can act as a barrier to reporting abuse.

The DfE has, in conjunction with the NSPCC, set up a dedicated helpline to support anyone who has experienced sexual abuse in educational settings. The dedicated NSPCC helpline number is 0800 136 663. <https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/>

Procedures for Reporting and Dealing with Child on child abuse

Pupils have access to wide-ranging pastoral support including Form Teacher, Tutors, Deputy Head, Learning Support Team, Nurse, Mental Health First Aider, Residential Duty Team, and Chaplain. Children know they are able to reach out to any member of staff with any concern at any time.

Children know that concerns will be followed up immediately. The practice of encouraging children to share is revisited during PSHE lessons, form times and the assembly programme. The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

All staff should be able to 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. The School recognises that in cases of peer on peer abuse that all the children involved, whether perpetrator or victim, are treated as being “at risk” and will act accordingly to safeguard their welfare.

The DSL (or DDSL) should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children’s social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact the City of London Children’s Services Team, and in any event within 24 hours of the DSL becoming aware of it. In these cases, the City and Hackney Safeguarding Children’s Partnership (CHSCP) Threshold of Needs Document should be used. https://www.chscp.org.uk/wp-content/uploads/2015/09/Thresholds-of-need-WEB-030915_Redacted.pdf

The DSL will discuss the allegations/concerns and agree on a course of action, which may include:

- Manage internally in line with the behaviour management policy and with help from external specialists where appropriate and possible.
- Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children

and their family. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

- Refer child/children to children's social care. Depending on the circumstance, the Police may be involved.
- In all of the scenarios, the school, along with the relevant agencies or specialists will support both the child who has experienced the abuse, ensuring that further abuse does not take place as well as helping children overcome any difficulties arising from the original situation.
- What support the victim requires depends on the individual child and their parents or carers and they will also be consulted, and a support plan will be drawn up.
- If the incidents are also of a bullying nature, the child may need support in improving relationships amongst their peer group or with other young people. Strategies will be put in place to monitor and support all the children involved. This may include 1:1 mentoring.
- The alleged perpetrator is also likely to need support as they may have unmet needs as well as the risk they could pose to other children. This could involve counselling or 1:1 mentoring.
- Other interventions for wider groups of children that may be considered could target a whole class or year group for example.

End of Appendix 4

Appendix 5

Steps to be taken if a child is presumed missing

1. The teacher on duty should immediately alert the Headmaster or Deputy Head. An initial search of the school will be carried out.
2. After 20 minutes, it must be presumed that the child has left the premises, in such case the Headmaster or the person deputising for him will immediately contact the child's parents and after consultation with the parents, alert the police. If the parents cannot be contacted, the Headmaster or the person deputising for him will make a decision about contacting the police or not.
3. A contact number will be given. A member of staff will be at that number until the child is accounted for.
4. A record of the absence and its outcome will be entered in the incident book.

Appendix 6

Steps to be taken when a child is missing from education (unauthorised absence)

1. With due regard to KCSIE ANNEX A and B
2. Children who are poor or irregular attenders, are more likely to be vulnerable and may become children missing from education. Poor and irregular attendance must be discussed with the school attendance service (Sarah Lewer, City of London).
3. For any unauthorised absence, the school office contacts parents/carers daily and immediately after the close of registration.
4. If a child is unaccounted for, revert to Appendix 5 above.
5. Following good practice guidance KCSIE (September 2020), the school will hold the details of more than one emergency contact for each pupil.

Safeguarding Children in School - Dealing with Disclosure

Dealing with a disclosure involves the hearer in identification of what is being heard. It is not the same as investigation.

The following seven step approach should aid the process.

Receive – Reassure – Respond – Report – Record – Remember - Review

1. Receive

- Listen
- Accept

2. Reassure

- Stay calm
- Don't appear shocked or disgusted
- Don't promise confidentiality
- Empathise

3. Respond

- No leading questions
- No judgments
- Explain what you will do next

4. Report

- To DSL, DDSL or a member of SLT
- If the child is in immediate danger, call 999

5. Record

- Write an accurate record
- Use the child's own words/diagrams
- Be objective
- Date and sign and give to DSL/DDSL

6. Remember

- Support the child by reassuring and listening to them

7. Review

- Were you able to deal with the disclosure confidently?
- Are you able to identify ways we could support each other better for future disclosures?

End of Appendix 7

Response to COVID-19

7a Safeguarding Policy

Appendix 8 - COVID-19 changes to the Policy

Response to COVID-19

There have been significant changes within our setting in response to the outbreak. Many young people are now at home and staffing is likely to be significantly affected through illness and self-isolation.

Despite the changes, the school's Child Protection Policy is fundamentally the same: **children and young people always come first, staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedure.**

This annex sets out some of the adjustments we are making in line with the changed arrangements in the school and following [advice from government](#) and local agencies.

Reporting arrangements

- The school arrangements continue in line with our policy.
- Any safeguarding concerns should be reported to Caroline Heylen (DSL), Joe Gorman (DDSL), Madeleine Smyth (DDSL) or Julie Schindler (DDSL) or via email, Teams or by telephone on the duty phone (07545 929841).
- The school's approach ensures the DSL or a deputy is always on site while the school is open.

Awareness

The pressures on children and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. This should be considered in the setting of any work for children to undertake at home (including recognising the impact of online learning).

Young people will be using the internet more during this period. The school may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and other risks online and apply the same child-centred safeguarding practices as when children were learning at the school.

Staff should be aware of the following Key Themes and Concerns emerging Nationally:

- Support networks could fail – some families could become unseen and unheard.
- Effects of Poverty – some families might be unable to meet basic needs.
- Accommodation – exposure to unsuitable accommodation may rise.
- Domestic Abuse – conflict and violence may escalate due to additional pressure and stress.
- Substance Abuse – unhealthy coping mechanisms may increase.
- Neglect – increased exposure of children to neglectful environments.
- Bereavement – effect of loss and limitations surrounding funerals in the case of bereavement during lockdown.

Guidance for online learning:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- No parent or child should initiate a call to a teacher using Microsoft Teams.
- Parents wishing to speak with a teacher should email the teacher concerned, who will schedule a call using Microsoft Teams.
- Consideration should be given to the location within the household for any computers used to maximise the opportunity for learning; and where possible be against a neutral background.
- Think about what may be in view in the background, for instance photos of a beach holiday, so that it is not an intrusion of privacy.
- Language and conduct must be professional and appropriate, including any family members in the background.
- Parents should oversee the use of electronic devices used at home and children should be regularly monitored throughout their online learning activities.
- Staff and pupils should only use their SPCS Google account to enter a Google Meet; requests from users not signed in with SPCS accounts should be ignored.
- Staff should actively be checking if any pupil name appears twice and ask the pupil to identify themselves by their camera or voice.

Online Platforms

- Staff should use Microsoft Teams or GoogleMeets for spoken communication with individual families or pupils.
- Staff in EYFS will use Microsoft Teams for online learning and communication.
- Staff in Y1 – Y8 will use Google Classroom for online learning and communication with pupils.

March 2020

Updated May 2020

Updated January 2021

Reviewed September 2021

Reviewed September 2022

End of Appendix 8

Appendix 9 – Record of Concern Form

Child's Name:			
Child's DOB:			
Male/Female	Ethnic Origin	Disability Y/N	Religion
Date and time of concern:			
Your account of the concern: (what was said, observed, reported and by whom)			
Additional information: (context of concern/disclosure)			
Your response: (what did you do/say following the concern)			
Your name:		Your signature:	
Position in school:		Date and Time of this record:	
Action and response of DSL:			
Feedback given to member of staff reporting concern:		Information shared with any other staff? If so, what information and rationale for doing so?	

Return completed form to:

DSL – Caroline Heylen; DDSL – Joe Gorman, Madeleine Smyth, Julie Schindler

Safeguarding Children and Young People

Safe Working Practice Agreement

St Paul's Cathedral School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

It is everyone's responsibility to ensure that pupils are cared for appropriately and safeguarded from any harm, and their duty of care to promote the health, safety and welfare of all members of the school community.

The Safeguarding Policy, as well as other policies in the staff handbook, the school's Code of Conduct and the Code of Conduct for Children give clarity to the measures needed to ensure that all employees and pupils can work within and enjoy being part of a safe and caring environment.

It is acknowledged that the vast majority of employees behave appropriately whilst working with our pupils. Whilst it is recognised that the individual members of an organisation may hold differing values and opinions, adults working in a school are in a position of trust and their conduct is, therefore, governed by specific laws and guidance and the policies and procedures agreed by the headmaster and governing body.

Staff occasionally express uncertainty as to what is and is not acceptable and seek guidance regarding those behaviours which, whilst most probably innocent, may be perceived by others as inappropriate*.

The following is, therefore, a code of appropriate conduct for all adults working in or on behalf of the school, including those involved in home visits or any out of school activities. Adherence to this code should ensure that both children and adults are safe from misconduct or unfounded designated of misconduct.

You should always:

- Adhere to all school policies, many of which are specifically written with safeguarding in mind. For example: Safeguarding (Child Protection); Behaviour; Physical Intervention; Anti-Bullying; Equal Opportunities; Health and Safety; Disability Discrimination; E-Safety.
- Behave in a mature, respectful, safe, fair and considered manner at all times.
- Provide a good example and 'positive role model' to the pupils.
- Observe other people's right to confidentiality (Unless you need to report something to the Headmaster or Child Protection Officer e.g. concerns about a child protection issue).

- Treat all children equally, never confer favour on particular children, or build 'special relationships' with individual children, except where one-to-one working is part of a plan agreed with your manager (e.g. for counselling, tuition, mentoring or other purpose).
- Inform the Headmaster, the Deputy Head or your line manager if you are going to be working alone in a room with a child.

Report to the Headmaster / Child Protection Officer (or in the case of an allegation concerning the Headmaster, the Chair of Governors) as soon as possible:

- Any behaviour or situation which may give rise to complaint, misunderstanding or misinterpretation against yourself.
- Any difficulties that you are experiencing, for example, coping with a child presenting particularly challenging behaviour; situations where you anticipate that you may not be sufficiently qualified, trained or experienced to deal with or handle appropriately.
- Any behaviours of another adult in the school which gives you cause for concern or breach of this code of conduct or other school policies and procedures.

You should never:

- **Behave in a manner that could lead to a reasonable person to question your conduct, intentions or suitability to care for other people's children;**
- touch children in a manner which is or may be considered sexual, threatening, gratuitous or intimidating;
- discriminate either favourably or unfavourably towards any child;
- give personal contact details to children under the age of 18, in particular present and past pupils, text, email or telephone them except for agreed work purposes using work IT, or make arrangements such as using social websites (e.g. Facebook) to contact, communicate or meet children outside of work;
- develop 'personal' or sexual relationships with children;
- push, hit, kick, punch, slap, throw missiles at or smack a child, or threaten to do so;
- be sarcastic, embarrass or humiliate, make remarks or "jokes" to children of a personal, racist, discriminatory, intimidating or otherwise inappropriate* or offensive nature;
- give or receive (other than 'token') gifts unless arranged through your line manager / Headmaster, for example, outgrown sports kit, football boots or uniform;
- allow, encourage or condone children to act in an illegal, improper or unsafe manner, e.g. smoking or drinking alcohol;
- behave in an illegal or unsafe manner, for example, exceeding the speed limit, being under the influence of drugs or alcohol, driving a vehicle which is known to be un-roadworthy or otherwise unsafe or not having appropriate insurance,

using a mobile phone whilst driving, failing to use seatbelts and drive in a safe manner at all time whilst transporting children;

- undertake any work with children when you are not in a fit and proper physical or emotional state to do so. For example: under the influence of medication which induces drowsiness; with a medical condition which dictates that you should not be caring for children; under extreme stress which is likely to impair your judgement.

***Please note:**

It is the perception of the person subject to a remark or action rather than your stated intention that defines 'appropriate' or 'inappropriate'.

I have read the school's policy on Safeguarding and agree to abide by the Safe Working Practice guidance contained therein and in this document.

Signed Date.....

The Headmaster and Governors of St Paul's Cathedral School thank you for your support of the arrangements made for the safety and care of young people and adults in our school community.

Signed.....Headmaster

Date.....

