



Safeguarding and Child Protection Policy

Key external contact details

<b>Local Authority Designated Officer</b>	<p>Gourita Gibbs Child Protection Advisor 0207 641 4199 <a href="mailto:ggibbs@westminster.gov.uk">ggibbs@westminster.gov.uk</a></p> <p>John Griffin Child Protection Advisor 0207 641 1615 <a href="mailto:jgriffin@westminster.gov.uk">jgriffin@westminster.gov.uk</a></p> <p>Gabby Bernard Child Protection Advisor 0207 641 4003 <a href="mailto:gbernard@westminster.gov.uk">gbernard@westminster.gov.uk</a></p> <p>Kembra Healy TEL: 07522 217 314 <a href="mailto:kembra.healy@rbkc.gov.uk">kembra.healy@rbkc.gov.uk</a></p>
<b>Local Authority Children's Social Services</b>	<p>TEL: 020 7641 4000 EMAIL: <a href="mailto:AccesstoChildrensServices@westminster.gov.uk">AccesstoChildrensServices@westminster.gov.uk</a></p> <p>OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 7641 6000</p>
<b>Multi-Agency Safeguarding Hub</b>	<p>TEL: 020 7641 4000 EMAIL: <a href="mailto:AccesstoChildrensServices@westminster.gov.uk">AccesstoChildrensServices@westminster.gov.uk</a></p>
<b>Support and Advice about Extremism</b>	<p><b>Police</b> Charing Cross Police station (24 hours) Agar Street, WC2N 4JP TEL: 020 7240 1212 Anti Terrorism hotline: 0800 789 321 EMERGENCY: 999 NON EMERGENCY NUMBER: 101</p>

	<p><b>Local Authority</b> Westminster TEL: 020 7641 6032 EMAIL: <a href="mailto:prevent@westminster.gov.uk">prevent@westminster.gov.uk</a> PREVENT LEAD: Mark Chalmers</p> <p><b>Department for Education</b> NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a></p>
<b>NSPCC Whistleblowing Advice Line</b>	<p>ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> WEBSITE: <a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a></p>
<b>Disclosure and Barring Service</b>	<p>ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a></p>
<b>Teaching Regulation Agency</b>	<p>ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a></p>

### Key School contact details

<b>Governors</b>	<p><b>Chair of Governors</b> Aatif Hassan TEL: +44 (0) 203 696 5300 EMAIL: <a href="mailto:aatif.hassan@dukeseducation.com">aatif.hassan@dukeseducation.com</a></p> <p><b>Nominated Safeguarding Governor</b> Aatif Hassan TEL: +44 (0) 203 696 5300 EMAIL: <a href="mailto:aatif.hassan@dukeseducation.com">aatif.hassan@dukeseducation.com</a></p>
<b>Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Lead (DDSL)</b>	<p><b>Main DSL for the School</b> Chris Farman TEL: 0203 9497416</p>

	<p>EMAIL: <a href="mailto:chris.farman@eatonsquaremayfair.com">chris.farman@eatonsquaremayfair.com</a></p> <p><b>Deputy DSL</b>  Hannah Sheehy  TEL: 0203 9497416  EMAIL:  <a href="mailto:hannah.sheehy@eatonsquaremayfair.com">hannah.sheehy@eatonsquaremayfair.com</a></p>
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<b>Co - Heads</b>	<p>John Wilson  TEL: 0207 4917393  EMAIL: <a href="mailto:john.wilson@eatonsquaremayfair.com">john.wilson@eatonsquaremayfair.com</a></p> <p>Caroline Townshend  TEL: 0207 4917393  EMAIL:  <a href="mailto:caroline.townshend@eatonsquaremayfair.com">caroline.townshend@eatonsquaremayfair.com</a></p>

## POLICY STATEMENT

This policy applies to Eaton Square Mayfair (“the School”) which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website and by request.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2019) (*‘KCSIE’*)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (July 2018)
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
  - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
  - The use of social media for on-line radicalisation (July 2015)

This policy should be read in conjunction with the Missing Pupil Policy. It also takes into account the procedures and practice of Westminster as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board.

## **CONCERNS ABOUT A CHILD**

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility.

Parents are encouraged to raise any concerns directly with the school, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Details of these arrangements are i) drop in sessions available with Place2Be, ii) form teachers have time each week to follow up concerns during registration, iii) form teachers are supported by Heads of Year in weekly meetings, iv) good relationships forged with Local Safeguarding Children Board.

### **Definitions of safeguarding and types and signs of abuse**

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

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

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

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

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

If staff suspect or hear an allegation or complaint of abuse or neglect from a pupil or any third party, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, Information Sharing: Advice for Practitioners Providing safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ('DSL').

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the pupil) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. Staff are expected to provide a signed written record, including the date and time, the emotional state of the pupil, recording as much of the conversation in the pupil's own words as possible if a discussion has taken place. Report to be placed on CPOMS. Staff must then hand this to the DSL as soon as possible. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead ('DSL') or their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by providing a pupil concern box for pupils to express their views and give feedback. This is checked by a member of the pastoral team on a weekly basis. The School operates its processes with the best interests of the pupil at their heart.

### **Contextual Safeguarding**

All staff, but especially the DSL and any deputies, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside the school. The school will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The school will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

## **Early Help**

Any pupil may benefit from early help but all staff should be particularly alert to the potential need for early help for a pupil who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.

Early help means providing support as soon as a problem emerges at any point in a pupil's life, from the foundation years through to the teenage years.

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

Place2Be are in residence (from September 2019) at Eaton Square Mayfair on Mondays and Tuesdays. They provide early intervention, school-based support, and in-depth training programmes to improve the emotional well-being of pupils and teachers.

### **What staff should do if they have concerns about a pupil**

If staff (including governors, agency staff and volunteers) have any concerns about a pupil (as opposed to a pupil being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a pupil's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL

and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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

If staff (including governors, agency staff and volunteers) believe that a pupil is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Board is Westminster. A full copy of their local procedures can be found here <https://www.rbkc.gov.uk/lscb/about-us>

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

Staff should follow the School's normal referral processes when there are concerns about pupils who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a pupil being drawn into terrorism they must call 999 or contact the Anti-Terrorism hotline: 0800 789 321. Advice and support can also be sought from children's social care.

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

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

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

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

Pupils who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for

dealing with children who go missing from education are found in the Missing Pupil Policy to be used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern<sup>30</sup>

The School will report to the School Admission Officers at Westminster City Council if a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

### **What staff should do if they have concerns about another staff member**

If staff have concerns about another staff member, then this should be referred to the Heads. Where there are concerns about the Heads, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against either Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) at the Westminster City Council.

### **What staff should do if they have concerns about safeguarding practices in the school**

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

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

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

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, sexting, sexual assault, gender-based issues<sup>36</sup> and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh" or "boys being boys". The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.



The School recognises that pupils with special educational needs and disabilities can be more prone to peer on peer group isolation than other pupils and will consider extra pastoral support for those pupils. The school SENCo together with the pastoral staff will ensure that concerns regarding pupils with SEN are recorded and actioned.

The School takes the following steps to minimise the risk of peer-on-peer abuse. Firstly, the School recognises that peer on peer abuse can and will occur on any site even with the most stringent of policies and support mechanisms. There is an active bullying log. There is an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PSHE/SMSC curriculum and assembly programme that tackles such issues as prejudiced behaviour and gives pupils an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. This is further supported by the Girls on Board programme which puts the onus on girls themselves to consider their role in the dynamic of relationship problems. There is whole staff training and CPD around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice. Signposting is made available to young people through a display board with support services on a wide range of issues so young people can seek their own solutions should they wish to. There is also a school council with a pupil voice to encourage young people to support changes and develop 'rules of acceptable behaviour' to help create a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

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

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The School's approach to sexting is to initially take a pastoral view and seek to support the pupils involved using the pastoral team's expertise. The School will not seek to criminalise those involved and instead

support pupils and help them understand the consequences of their actions. The School will work closely with parents and may involve the police in a supportive capacity.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a comprehensive pastoral team at the School consisting of form teachers, Heads of Year, Deputy Head (Pastoral), both Heads and further support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other pupils (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

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

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

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

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

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is one of the Heads OR to the DSL. If an allegation is reported to the DSL, the DSL will keep the Heads informed. Where the Heads OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Heads OR DSL is the subject of the allegation or concern, the Heads OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and designated officer. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where

an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA)). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

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

## **STAFF CODE OF CONDUCT**

The School's code of conduct can be found in the policies section of the school website. The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

## **SAFER RECRUITMENT**

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child

protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment and Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriate supervised is set out in the School's Visitor Policy.

During the process of recruiting governors, an s128 check is required.

## **MANAGEMENT OF SAFEGUARDING**

The School's DSL Chris Farman, who is a member of the leadership team.

Hannah Sheehy is the DDSL and the person to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

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

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

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are for contact to be made with MASH (020 7641 4000, [AccesstoChildrensServices@westminster.gov.uk](mailto:AccesstoChildrensServices@westminster.gov.uk)).

Full details of the DSL's role can be found at Annex B of *KCSIE*.

Whilst the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

### **Proactive Approaches to Safeguarding**

Our proactive approach to safeguarding includes the following:

- Form Period talks and sessions
- PSHE talks and lessons
- Advice and guidance through other mechanisms (House, School Council, etc)
- External speakers to talk to the pupils about a variety of issues; Internet safety, cyber bullying, screen time and abuse, etc.
- Clear expectations from the staff
- Place2Be

### **TRAINING**

Induction and training are in line with advice from the LSCB.

#### **All Staff**

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

- the child protection policy;
- the role and identity of the DSL(s) and any DDSL
- the behaviour policy
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE* (and Part five of *KCSIE*).

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

Temporary staff and volunteers are provided with a lanyard detailing important safeguarding information, the DSL and a link to the full safeguarding policy.

All staff are also required to:

- Read Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via updates in staff meetings, INSET days and weekly bulletins.
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding through updates in staff meetings, questionnaires, INSET days and weekly bulletins.

- Receive training in safeguarding and child protection regularly, in line with advice from the LSCB. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, emails, bulletins and staff meetings.

## **DSL**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the LSCB's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

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

The DDSL is trained to the same level as the DSL.

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

Aatif Hassan is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the governing body.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The Annual Review forms part of the Summer Term Governors Review Meeting. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

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

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

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

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils

about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's ICT curriculum and also embedded in PSHE and relationships and sex education (RSE).

Pupils should be clear about what is expected of them online as offline (Teaching Online Safety in Schools, 2019, DfE).

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

### **Looked after children**

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any pupils on roll who are looked after by a local authority.

Lucy Price is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

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

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

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

Visiting speakers, whilst on the School site, will be supervised by a school employee. On attending the School, visiting Speakers will be required to show original current identification



documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy. A full explanation of the School's procedures are found in the School's Visitor Policy.

**Arrangements for off-site games and club venues, visits to Green/Hyde Park, visits to Church, Trips and Peripatetic lessons:**

- Staff / pupil ratio is always adhered to
- Risk assessments completed and provided
- Safeguarding information given to staff
- Appropriate checks carried out

**EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

**Disqualification from working in childcare**

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

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

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

**Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Acceptable Use Policy. Staff are not permitted to use their personal mobile devices or cameras in school. Staff who wish to use take photographs or video of pupils (whether on a personal or school device) must first speak with the Heads to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Heads. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Heads.

## **Duty to notify Ofsted**

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

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

## **APPENDIX 1 – SIGNS AND TYPES OF ABUSE**

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

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur

between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

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

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

**Upskirting:** 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.

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

care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

**Child criminal exploitation (county lines):** Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can 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.<sup>161</sup>

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

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

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.

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

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

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

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks,

staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Special educational needs and/or disabilities:** Pupils with SEND may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

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

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

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

**Domestic abuse:** Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviours, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy<sup>175</sup>.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy<sup>176</sup>

**Children who go missing from school:** A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing

with children who go missing can be found in the School's Missing Pupil Policy. All unexplained absences will be followed up in accordance with this Missing Pupil Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

**Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate<sup>183</sup>.

**Children with family members in prison:** Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**Authorised by**

Co-Heads

**Date**

September 2019

**Review Date**

September 2020