Godolphin&Latymer

Safeguarding (Child Protection) Policy



Reviewed by AT: November 2018
Minor amendment: January 2019
Approved by Governors: December 2018
Next review date: November 2019

Contents

	Page
Contact Details	3
Policy	6
Appendix 1: The Designated Safeguarding Lead	17
Appendix 2: Types and signs of abuse	19
Appendix 3: Guidance for staff on suspecting or hearing a complaint of abuse	27
Appendix 4: Dealing with allegations against staff or volunteers	28
Appendix 5: Flowchart of action to take	33
Appendix 6: Prevent Strategy – information and referrals flowchart	34
Appendix 7: Further Guidance (including Part 1 of Keeping Children Safe in Education)	38

Contact Details

Godolphin and Latymer School

Role	Name	Telephone	Email
Designated Safeguarding Lead	Amanda Triccas	020 8741 1936	atriccas@godolphinandlatymer.com
Deputy Designated Safeguarding Leads	Anna Paul Jennifer Wright	020 8741 1936	apaul@godolphinandlatymer.com jwright@godolphinandlatymer.com
Head Mistress	Frances Ramsey	020 8741 1936	headmistress@godolphinandlatymer.com
Chair of Governors and Nominated Safeguarding Governor	Alison Paines	Write c/o School Office, Godolphin and Latymer School, Iffley Road, London W6 0PG OR the Clerk to the Governors, Mrs Diana Lynch, (020 8735 9595) can provide a telephone number in urgent cases	
Deputy Nominated Safeguarding Governor	Elisabeth Watson	Write c/o School Office, Godolphin and Latymer School, Iffley Road, London W6 0PG OR the Clerk to the Governors, Mrs Diana Lynch, (020 8735 9595) can provide a telephone number in urgent cases	

London Borough of Hammersmith and Fulham

Full Tri-Borough LSCB Procedures can be found at: http://www.londoncp.co.uk/

Role	Name	Telephone	Email
Local Authority Designated Officer (LADO)	Duty Child Protection Adviser (*if unavailable contact Megan Brown – see below*)	020 8753 5125	lado@lbhf.gov.uk
Named LADO / Safer Organisations and Safeguarding in Education Manager	Megan Brown	020 8753 5125	megan.brown@lbhf.gov.uk

Children's Social Care Services Department	Initial Contact and Advice Team (ICAT)	020 8753 6610 (Mon-Fri 9am – 5pm) 020 8748 8588 (Out of hours)	-
Child Sexual Exploitation Lead	Emily Harcombe	020 8753 6918 / 07467 734 648	emily.harcombe@lbhf.gov.uk
Tri-borough FGM	Rochelle-Ann Naidoo	020 7641 1610	rnaidoo@westminster.gov.uk
ACE Team (inc. children missing education)	Liz Spearman	020 8753 6231	elizabeth.spearman@lbhf.gov.uk
Tri-borough Multi-Agency Safeguarding Hub (MASH)	Karen Duncan (Tri-borough MASH business support officer)	020 7641 3991	kduncan1@westminster.gov.uk

PREVENT / Counter-extremism

Role	**Name**	**Telephone**	**Email**
School Prevent Lead (also DSL)	Amanda Triccas	020 8741 1936	atriccas@godolphinandlatymer.com
Bi-borough Prevent	Local team	020 8753 5727	prevent@lbhf.gov.uk
Local Police Force	Hammersmith and Fulham	999 (emergency) 101 (non-emergency)	-
Anti-Terrorist Hotline		0800 789 321	-
DfE dedicated non-emergency helpline/email	-	020 7340 7264	Counter.extremism@education.gsi.gov.uk

Other Local Authorities

Anyone concerned about a child can contact the Children's Social Care Services Department in the local authority where the child is resident (to find contact details for a local authority click here or go to www.gov.uk/report-child-abuse-to-local-council). Authorities near to the School include:

Local Authority	**Working Hours**	**Out of Hours**
Brent	020 8937 4300	020 8863 5250
Camden	020 7974 3317	020 7974 4444
Ealing	020 8825 8000	020 8825 8000
Hammersmith and Fulham	020 8753 6600 / 6610	020 8748 8588
Hounslow	020 8583 6600	020 8583 2222
Islington	020 7527 7400	020 7226 0992
Kensington and Chelsea	020 7361 3013	020 7361 3013
Kingston	020 8547 5008	020 8770 5000
Merton	020 8545 4226 / 4227	020 8770 5000
Richmond	020 8547 5008	020 8770 5000
Wandsworth	020 8871 6622	020 8871 6000
Westminster	020 7641 4000	020 7641 6000

Other numbers

The following telephone numbers may be useful for pupils, parents or staff:

Childline	0800 1111
NSPCC	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285
Ofsted's Whistleblowing Hotline	0300 123 3155

1 Policy statement

1.1 This policy has been authorised by the Governors, is provided to all members of staff and volunteers, is published on the School website and is available in hard copy to parents on request. This policy can be made available in large print or other accessible format if required.

1.2 This policy has been developed in line with government publications including: *Working Together to Safeguard Children* (2018), *Keeping Children Safe in Education* (2018), *Prevent Duty Guidance for England and Wales* (2015) and *What to do if you are worried a child is being abused* (2015) (See Appendix 7 for a full list of guidance and useful links). The policy and its procedures apply wherever staff or volunteers are working with pupils even where this is away from the School, for example on an educational visit. This policy should be read in conjunction with other relevant school policies including: Recruitment; Attendance; Behaviour; Anti-Bullying; E-Safety, Health and Safety; Code of Conduct for Staff; and Equal Opportunities policies, all of which are available on the School website. Staff and pupils must also be familiar with the School's Acceptable Use of ICT for Staff policy and Code of Conduct for Pupils Use of ICT respectively.

1.3 The School is committed to safeguarding and promoting the welfare of children and young people. This is everyone's responsibility and the School expects all staff and volunteers to share this commitment and to consider, at all times, what is in the best interests of the child. Safeguarding children means:

1.3.1 protecting children from maltreatment;

1.3.2 preventing impairment of children's health or development;

1.3.3 ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and

1.3.4 taking action to enable all children to have the best outcomes.

1.4 Every child without exception should feel safe and protected from any form of abuse, regardless of gender, ethnicity, disability, sexuality or beliefs. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

1.5 Abuse can be:

1.5.1 physical abuse, for example beating or punching;

1.5.2 emotional abuse, for example rejection and denial of affection;

1.5.3 sexual abuse, for example sexual assault or encouraging a child to view pornographic material; and

1.5.4 neglect, for example failure to provide appropriate care including warmth or medical attention.

See Appendix 2 for further details about the types and signs of abuse and DfE guidance *What to do if you are worried a child is being abused* (2015) for additional information (see Appendix 7).

1.6 A child may also be at risk of harm as a result of being drawn into extremist or terrorist behaviour. Under the government's 'Prevent' strategy, school staff must be able to identify children at risk of being drawn into terrorism, challenge extremist ideas and know how to refer children for further help. Information about the 'Prevent' duty and the School's approach to identifying and supporting children at risk of radicalisation is set out in Appendix 6.

1.7 Where a child is in immediate danger or is at risk of harm, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not in immediate danger or at risk of harm. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.

1.8 The School will take all reasonable measures to:

1.8.1 ensure that the School practises safer recruitment in checking the suitability of staff and volunteers (including members of the governing body and staff employed by another organisation) to work with children and young people in accordance with the guidance given in Part 3 of *Keeping Children Safe in Education* (2018). See the School's Recruitment Policy which is available on the website;

1.8.2 ensure that where staff from another organisation are working with our pupils on another site, the School has received assurances that appropriate child protection checks and procedures apply to those staff;

1.8.3 ensure that all staff have read and understood Part 1 of *Keeping Children Safe in Education* (2018), a link to which is in Appendix 7 to this policy, and that mechanisms are in place to assist staff to discharge their roles and responsibilities as set out in that guidance;

1.8.4 ensure that all teaching staff, and those members of non-teaching staff who work directly with pupils, have read Annex A to *Keeping Children Safe in Education* (2018);

1.8.5 follow the local inter-agency procedures of the Local Safeguarding Children Board for Hammersmith & Fulham, Kensington & Chelsea and Westminster (the 'Tri-Borough LSCB');

1.8.6 listen to children and be aware that some pupils may be in need of early help or additional support, even if they are not in immediate danger or at risk of harm (see Appendix 2 for a list of indicators that a child may benefit from early help or be in need of safeguarding support);

1.8.7 ensure that all staff and volunteers understand the need to identify concerns early and provide support for children as soon as a problem emerges at any point in a child's life to prevent concerns from escalating;

1.8.8 be alert to indicators of abuse and neglect both in the School and from outside and aim to protect each pupil from any form of abuse, whether from an adult or another pupil (see Appendix 2 for further information on potential indicators of abuse);

1.8.9 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with their agreed child protection plan;

1.8.10 design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations;

1.8.11 ensure that where children are engaged in close one-to-one teaching, appropriate safeguarding arrangements are in place (guidance is included in the Staff Code of Conduct, the Safeguarding Training Booklet and in other School training resources);

1.8.12 be alert to the medical needs of children with medical conditions and the additional vulnerability of children with special educational needs or disabilities;

1.8.13 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

1.8.14 ensure that children are taught about safeguarding, including keeping safe online, through the curriculum and PSHE, with particular regard to how children can adjust their behaviours to reduce risks and build resilience, including to radicalisation, particularly through the safe use of electronic equipment and the internet (see in particular the PSHE and Citizenship Policy and schemes of work);

1.8.15 be alert to the risk of vulnerable children being drawn into extremist behaviour and develop staff training and procedures in accordance with the 'Prevent' duty (see Appendix 6 for further details including potential indicators of vulnerability to extremist ideology and the Channel Panel referrals flowchart, and Appendix 7 for DfE guidance);

1.8.16 ensure that children are safeguarded from potentially harmful and inappropriate online material by ensuring appropriate filters and monitoring systems are in place and there are clear rules regarding access to 3G/4G on school premises (see the School's E-Safety policy and Code of Conduct for Pupils' Use of ICT);

1.8.17 take all practicable steps to ensure that School premises are as secure as circumstances permit;

1.8.18 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area;

1.8.19 ensure that, where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is 'looked after';

1.8.20 work with social care, the police, health services and other services to promote the welfare of children and protect them from harm; and

1.8.21 have regard to guidance issued by the Secretary of State for Education (**DfE**) in accordance with section 157 of the Education Act 2002 and associated regulations.

1.9 *Keeping Children Safe in Education* provides that the inspection of independent schools will ensure that the Independent School standard which covers the welfare, health and safety of children is met.

2 The Designated Safeguarding Lead ('DSL')

2.1 The School has appointed a member of the School's senior leadership team to be the DSL responsible for matters relating to child protection and welfare, including online safety.

2.2 Anyone who has concerns about the welfare of any child in the School may approach the DSL. If preferred, parents may discuss concerns in private with the child's form teacher, Head of Year, Head of Section, the Senior Deputy Head (Pastoral) or the Head Mistress who will notify the DSL in accordance with these procedures.

2.3 The name and contact details of the DSL are set out on page 3 of this policy and the main responsibilities of the DSL are as set out in Annex B to *Keeping Children Safe in Education* (2018) and in Appendix 1.

2.4 If the DSL is unavailable his / her duties will be carried out by one of the Deputy DSLs (see page 3 for contact details). In this policy, reference to the DSL includes either Deputy DSL where the DSL is unavailable. Other than in the most exceptional circumstances, the DSL or one of the Deputy DSLs will be available during school hours to discuss concerns.

2.5 The DSL and the Deputy DSL have undertaken appropriate child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in line with advice from the Tri-borough LSCB.

3 Duty of employees, governors and volunteers

3.1 Every employee and governor of the School as well as every volunteer who assists the School is under a general legal duty:

3.1.1 to provide a safe environment in which pupils can learn;

3.1.2 to be alert to the circumstances that may mean a child is in need of early help and to the indicators of abuse, neglect and radicalisation and to question the behaviour of children and parents so that they are able to identify cases of pupils who may be in need of help or protection;

3.1.3 to protect pupils identified as in need of early help or who are in immediate danger or at risk of harm and not to assume that a colleague will take action or share information that might be critical in keeping children safe;

3.1.4 to be aware of the School's child protection procedures and to follow them;

3.1.5 to know how to access and implement the School's child protection procedures, independently if necessary;

3.1.6 to keep a sufficient record of any significant complaint, conversation or event in accordance with this policy; and

3.1.7 to listen to children and take appropriate action, taking into account the wishes of the child, and acting in the best interests of the child and in accordance with this policy, including reporting matters of concern to the DSL and working with other services as required.

3.2 The Governors ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare and that the School's safeguarding arrangements reflect the procedures and practice of the Tri-borough LSCB, including local protocols for assessment and published thresholds for referral (see Appendix 7). The Chair of Governors, at the request of the Governing Body, takes leadership responsibility for safeguarding arrangements, including the management of child protection incidents on behalf of the Governing Body as a whole, liaison with external agencies where this is required and monitoring the effective operation of this policy and the School's safeguarding procedures through the annual review of safeguarding (see also section 7 below). The Chair of Governors, as

Nominated Safeguarding Governor, is supported in fulfilment of this responsibility by Elisabeth Watson (Deputy Nominated Safeguarding Governor).

3.3 The School recognises the expertise of staff in safeguarding matters. All staff are encouraged to contribute to the development of this Safeguarding Policy, and related procedures, either through direct discussion with the DSL or via the School's Safeguarding Committee which meets termly and which all staff are invited to attend.

3.4 **Training**

3.4.1 Induction training on the School's child protection procedures will be provided to all staff, including temporary staff, and volunteers newly appointed. The training will include: general safeguarding and child protection training, including in online safety; this policy (which also includes the School's safeguarding response to children who go missing from education); the School's Code of Conduct for Staff; the Acceptable Use of ICT for Staff policy; the Whistleblowing Policy; the Behaviour policy (for pupils); the role and identity of the DSL and deputy DSLs; a copy of Part 1 of *Keeping Children Safe in Education* (2018) which includes Annex A; and the school's Safeguarding training booklet which contains specific local procedures including duties under Prevent and FGM. New staff will also be required to undertake a Level 2 Safeguarding training course online before they begin work or to provide certification showing that they have taken this training with another institution.

3.4.2 All staff working with children will undertake appropriate child protection training every three years and in line with advice from the Tri-borough LSCB. This will include 'Prevent' awareness training and training in on-line safety. In addition, the School will ensure that staff receive regular safeguarding updates via email, in staff meetings or through online training sessions. These will take place at least annually.

3.4.3 The child protection training provided to staff considers the circumstances that suggest a child may be in need of early help and also the types and signs of abuse that staff should be aware of. Further details are set out in Appendix 2, including physical, emotional and sexual abuse, neglect, child sexual exploitation and honour based violence.

3.4.4 All staff receiving induction training and/or child protection training will be required to confirm that they have received and understood the information covered in the training.

3.5 **Whistleblowing**

3.5.1 All staff are required to report to the Head Mistress, or the Chair of Governors in her absence, any concern or allegations about poor or unsafe school practices, potential failures in the School's safeguarding regime or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Further details of whistleblowing procedures are contained in the School's Whistleblowing Policy contained in the Employment Handbook. See also the contact number for the NSPCC whistleblowing helpline on p.5 of this policy.

3.5.2 See Appendix 4 for full details of the procedures to be followed in relation to allegations against staff.

4 Procedures

4.1 Concerns about a Child

4.1.1 If staff members have any safeguarding concerns about a child they should act immediately by following this policy and raising these concerns as soon as possible with the School's DSL. If, in exceptional circumstances, the DSL and deputy DSLs are all unavailable, staff should contact a member of the Senior Leadership Team and/or take advice from children's social care in the local authority where the child is resident.

4.1.2 If a member of staff receives a report of abuse, the procedures set out in Appendix 3 must also be followed. If the concerns involve a member of staff or volunteer at the School who may pose a risk of harm to children, see also paragraph 4.3 below and Appendix 4.

4.1.3 Parents, or those outside the School, may contact the DSL directly or, if preferred, discuss their concerns in private with a member of the School's pastoral team or the Head Mistress who will notify the DSL in accordance with these procedures.

4.1.4 Every concern raised about a child and every complaint or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy. In deciding whether to make a referral to children's social care or early help services, the DSL or staff member must always act in the best interests of the child and should also take into account the wishes of the child and the local authority thresholds for referral (see Appendix 7).

4.1.5 **If, at any point, a child is in immediate danger or is at risk of harm a referral should be made immediately to the children's social care services department in the local authority where the child is resident and/or the police (see Contacts p.3-4 for details). A referral would normally be made by the DSL but anybody can make a referral in exceptional circumstances, such as an emergency or where there is a genuine concern that appropriate action is not being taken. If a member of staff makes a referral directly, the DSL should be informed as soon as possible thereafter.**

4.1.6 Where a concern does not meet the threshold for immediate referral to children's social care, consideration should still be given as to whether a referral to children's social care for statutory assessment is appropriate or whether early help or other support, including additional pastoral support within school, would benefit the child. Use may be made of available local processes, such as an early help inter-agency assessment, the 'Common Assessment Framework' or 'Team around the Child' approaches, to ensure that the child receives that additional support. (See also the flowchart at Appendix 5.) Staff may be required to support the DSL or other agencies and professionals in an early help assessment or following a referral to the local authority children's social care services department.

4.1.7 Following a referral, or after early help or other internal pastoral support has been put in place, the child's case will be kept under constant review. If the child's situation does not appear to be improving the DSL, or the member of staff with concerns, should press for re-consideration, including a referral if this has not already been made, to ensure their concerns have been addressed. Concerns should always lead to help for the child at some point.

4.1.8 Safeguarding incidents and/or behaviour giving rise to concerns can be associated with factors outside the school environment and incidents can occur between children outside the School. All staff should consider the context within which an incident or behaviour arises and provide as much information as possible as part of the reporting and/or referral process. This is known as 'contextual safeguarding' and will allow any assessment to consider all the available evidence and the full context of any abuse.

4.2 Additional procedures for specific safeguarding issues

4.2.1 ***Children missing education***: A child going missing from education is a potential indicator of abuse or neglect. Pupils are required to thumb-in on arrival at school and unexplained absence at morning registration is followed up initially by the Receptionist and then by the Head of Section if the absence remains unexplained. Staff are required to notify the relevant Head of Section if a pupil in Years 7 – 11 is missing from afternoon registration or a lesson without explanation. If the Head of Section cannot explain the absence then the Senior Deputy Head (Pastoral) will be notified and a search will be conducted in school and parents and/or the police contacted as appropriate. Persistent or unexplained absence must be reported by form staff or Heads of Year to the relevant Head of Section who will discuss the pattern of absence with the Senior Deputy Head (Pastoral). The Senior Deputy Head (Pastoral) will decide, in consultation with the DSL as appropriate, whether the absence gives rise to safeguarding concerns. The School is required to inform the Local Authority of any pupil who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more. The School must also inform the Local Authority, using their proforma, of any pupil of compulsory school age who is going to be added to, or removed from, the admissions register other than those joining at the start of Year 7 or leaving at the end of Year 11.

4.2.2 ***Sexting (youth produced sexual imagery)***: This can be defined as the creation and/or sharing of sexual imagery (including photos and videos) usually via a mobile phone, tablet or computer or publication online. Depending on the circumstances, 'sexting' may constitute abuse or a criminal offence and for this reason any concern or allegation regarding 'sexting' must be reported to the Senior Deputy Head (Pastoral) or the DSL. Staff should not investigate further themselves and must never view, print or forward any illegal images of a child. Action will be taken in accordance with this safeguarding policy, taking into account guidance published by the UK Council for Child Internet Safety: '*Sexting in schools and colleges: responding to incidents and safeguarding young people*' which covers the creation and sharing of sexual imagery of those under 18 with others who are also under 18. Incidents involving 'sexting' will also be recorded on the School's e-safety incident log (see the School's E-safety Policy for more information). For the avoidance of doubt, the creation or sharing of sexual imagery of children *under* the age of 18 by those *over* the age of 18 constitutes child sexual abuse and in these circumstances, in addition to following the safeguarding procedures set out in this policy, the School will also inform the police.

4.2.3 ***Special educational needs***: Children with special educational needs and/or, disabilities can face additional safeguarding challenges and vulnerability, including to peer on peer abuse. Additional barriers can exist when recognising abuse and neglect in this group of children, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;

- the disproportionate impact, without any outward signs, upon children with special educational needs and/or disabilities by behaviours such as bullying; and
- communication barriers and difficulties in overcoming these barriers.

Members of staff should never assume that an indicator of a safeguarding concern is caused by a child's individual learning needs and should always discuss any such indicators with the DSL who will liaise with the School's Individual Needs Coordinator as appropriate.

4.2.4 ***Radicalisation and extremism***: If staff become aware of changes in a child's behaviour which could indicate that they are at risk of radicalisation or are exposed to extremism, this should be reported to the DSL as a safeguarding concern. The DSL will consider the level of risk to identify the most appropriate referral, which could include a referral to the local Channel Panel, children's social care, the local safeguarding children board or the police. Further information on radicalisation, on the Government's Prevent strategy and a referral flowchart are available at Appendix 6.

4.2.5 ***Female Genital Mutilation (FGM):*** If a teacher or regulated health or social care professional discovers that an act of Female Genital Mutilation appears to have been carried out they now have, from October 2015, a statutory duty personally to report that discovery to the police. Unless there is a good reason not to, the teacher should also follow the usual safeguarding procedures set out here and in Appendix 3.

4.3 **Allegations against, or concerns about, staff or volunteers**

4.3.1 The School has procedures for dealing with allegations against staff and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in full in Appendix 4 and follow the DfE guidance in Part 4 of *Keeping Children Safe in Education* (2018).

4.3.2 In summary, any allegation against a member of staff (including the DSL) or a volunteer should be reported to the Head Mistress. In her absence, the report should be made to the DSL (unless the allegation involves the DSL) or to the Chair of Governors. An allegation against the Head Mistress should be referred to the Chair of Governors or, in her absence, the Deputy Chair of Governors.

4.3.3 The Tri-borough LADO will be informed of all allegations against staff and volunteers that come to the School's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4. Allegations against a teacher who is no longer teaching and/or historical allegations of abuse will be referred to the police.

4.3.4 Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the School's Code of Conduct for Staff.

4.3.5 If a staff member has concerns about another staff member which do not amount to an allegation, these should also be referred to the Head Mistress in line with Part 1 of *Keeping Children Safe in Education* (2018). Concerns about the Head Mistress should be referred to the Chair of Governors. If a staff member is unsure about whether there are grounds for concern, this can be discussed first with the DSL or the Head Mistress as appropriate.

4.4 Allegations against pupils (peer on peer abuse)

4.4.1 Children may be harmed by other children from within or outside their own school community. The School has a clear Behaviour Policy and Anti-Bullying policy, both of which set clear expectations for pupil behaviour and aim to minimise the risk of peer on peer abuse at school. The PSHE and form time programmes offer guidance to pupils on behaviour and also on keeping themselves safe, including online.

4.4.2 Staff are aware of the harm that bullying can cause and will use the School's anti-bullying procedures where appropriate. However there may be occasions when a child's alleged behaviour, or the harm caused to another child by that behaviour, warrants a response under safeguarding as well as, or instead of, anti-bullying procedures. This will always be the case if there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Below this threshold, it is more likely to be the case if the allegation: is made against an older pupil and refers to their behaviour towards a younger or more vulnerable pupil; is of a very serious nature; or raises risk factors for other children within or outside the School.

4.4.3 Peer on peer abuse is still abuse and should never be tolerated or passed off as 'banter'. It may include instances of: bullying (including cyber-bullying); physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm); sexual violence or sexual harassment; sexting (see above); or initiation violence or rituals. If a member of staff has any concerns that bullying, or any other negative or devaluing behaviour, may give rise to safeguarding concerns they should discuss this with the DSL as soon as possible.

4.4.4 If a member of staff hears a complaint of peer on peer abuse from a child, including a report of sexual violence or harassment, the guidance in Appendix 3 should be followed.

4.4.5 The School will take advice from children's social care on the investigation of any allegations of peer on peer abuse and will take all appropriate action to ensure the safety and welfare of all pupils involved. In the case of an allegation of sexual violence or harassment, the School will also have regard to Part 5 of Keeping Children Safe in Education (2018). It is likely that all pupils involved, including the pupil or pupils accused of abuse, will be treated as being 'at risk'. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral to the local authority children's social care services will be made without delay.

4.4.6 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 children's social care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil.

4.4.7 A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's Behaviour Policy and/or Expulsion, Removal and Review Policy will apply.

4.5 **Listening to children**

4.5.1 The School provides a range of opportunities for pupils to be listened to. Pupils have contact with their form tutors twice daily (once in 6th form) for registration and also during extended form times and PSHE lessons. The School actively seeks the views of pupils through form reps meetings, the School Council and regular pupil surveys.

4.5.2 All pupils have a copy of the document 'Who to approach in the Godolphin and Latymer School' which outlines the sorts of problems pupils might encounter and the best person to contact within school. As well as form tutors and other staff who are always ready to listen, the School has two nurses, a doctor and two counsellors available to pupils.

4.5.3 Support for pupils who raise concerns is available in school from all staff but particularly from pastoral staff, the individual learning needs coordinator, the medical team and the school counsellors. The DSL may be involved in coordinating support within school or referring to outside agencies as appropriate and in line with the local authority thresholds for referral (see Appendix 7).

4.6 **Informing parents**

4.6.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures to support a child in need or about whom there are concerns relating to radicalisation. However, there may be circumstances when a DSL will need to consult the Senior Deputy Head (Pastoral), the Head Mistress, the LADO, local authority children's social care services/the Channel Panel and / or the police before discussing details with parents.

4.6.2 See also section 4 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff or volunteer at the School.

5 Secure school premises and visitor procedures

5.1 The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

5.2 The School has clear visitor procedures which have been communicated to all staff. All visitors who have not been vetted by the School in advance must sign in to the visitors book at Security on arrival and sign out on departure. They must be appropriately supervised whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.

5.3 The School actively encourages the use of visiting speakers to enrich the experiences of pupils and staff and to stimulate debate. However, staff must ensure that visiting speakers are appropriately vetted and supervised in accordance with the School's Visitor Procedures. In addition, any messages communicated to pupils by visiting speakers must be consistent with the ethos of the school, and must not marginalise any communities, groups or individuals or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.

6 Record keeping, confidentiality and information sharing

6.1 Where there are concerns about a child, all concerns, discussions and decisions made, and the reason for those decisions, should be recorded in writing.

6.2 The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and local authority children's social care services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working together to Safeguard Children* (2018) and the DfE's non-statutory guidance entitled *Information Sharing: Advice for Practitioners* (2018).

6.3 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and local authority children's social care services to agree the information that should be disclosed and to whom.

7 Monitoring

7.1 After any serious child protection incidents at the School, consideration will be given to a review of the safeguarding procedures within the School and a report made to the Governors if appropriate. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures.

7.2 In addition, the DSL will ensure that this policy is reviewed annually or when legislation changes and its procedures and implementation are updated and reviewed regularly, working with the Governors as necessary.

7.3 The Governors will undertake an annual review of this policy and its procedures, including good cooperation with local agencies, and of the efficiency with which the relevant duties have been discharged.

7.4 The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay.

Appendix 1: The Designated Safeguarding Lead (DSL)

The main responsibilities of the DSL, or the Deputy DSLs if the DSL is not available, are:

- To take lead responsibility for safeguarding and child protection, including online safety, in the School (this responsibility cannot be delegated);

- **Manage referrals**
  - Refer cases of suspected abuse to the local authority children's social care as required and/or support staff who make such referrals;
  - Refer cases to the Channel programme where there is a radicalisation concern as required and/or support staff who make such referrals;
  - Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
  - Refer cases where a crime may have been committed to the Police as required.

- **Work with others**
  - Liaise with the Head Mistress to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
  - As required, liaise with the 'case manager' (as per Part four of *Keeping Children Safe in Education* (2018)) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
  - Liaise with staff (especially pastoral staff, school nurses, the IT Network Manager and the Individual Learning Coordinator) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
  - Act as a source of support, advice and expertise for staff.

- **Undertake training**
  - Undertake training as required for the role, including Prevent awareness training, at least every two years.
  - Refresh knowledge and skills (e.g. via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, in order to:
    - Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
    - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
    - ensure that each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
    - be alert to the specific needs of children in need, those with special educational needs and young carers;
    - be able to keep detailed, accurate, secure written records of concerns and referrals;
    - understand and support the School with regards to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation;
    - understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
    - recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident that they have the capability to support SEND children to stay safe online;

- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

- **Raise Awareness**
  - Ensure that the School's child protection policies are known, understood and used appropriately;
  - Ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
  - Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this; and
  - Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

- **Child protection file**
  - Ensure that when children leave the School their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.
  - In addition to the child protection file, consider whether it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

- **Availability**
  - Always be available (during school hours), or ensure that a deputy DSL is available, for staff in the School to discuss any safeguarding concerns.

Appendix 2: Types and signs of abuse

1 Types of abuse

1.1 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.

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

1.3 A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone.

1.4 **Physical abuse**: a form of abuse which may involve hitting, pinching, 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.

1.5 **Emotional abuse**: the persistent emotional maltreatment of a child. It is sometimes called psychological abuse and it can have severe and persistent 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. Emotional abuse may also involve serious bullying by a child's peers (including online bullying through social networks, online games or mobile phones). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

1.6 **Sexual abuse**: involves any sexual activity with a child, not necessarily involving a high level of violence, whether or not the child understands what is happening or that it is wrong. Many children who are the victims of sexual abuse do not recognise themselves as such. The sexual activity 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 (this includes 'sexting'), forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. 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 in education.

1.7 **Child sexual exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased

status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

1.8 **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs. It is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example 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. Children who are neglected often also suffer from other types of abuse.

1.9 **'Honour based' violence (HBV), including Female genital mutilation (FGM):** HBV encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse, regardless of the motivation, and should be handled and escalated as such. FGM involves mutilation of the labia majora, labia minora or clitoris of girls. It is prevalent in 28 African countries as well as in parts of the Middle East and Asia. It is a form of child abuse, and of violence against women and girls, and it has severe short term and long-term physical and psychological consequences.

1.10 **Sexual violence and sexual harassment between children:** 'sexual violence' as used in *Keeping Children Safe in Education*, refers to sexual offences under the Sexual Offences Act 2003 (i.e. rape, assault by penetration or a sexual assault). Sexual harassment is defined as 'unwanted conduct of a sexual nature' that can occur online and offline (e.g. sexual comments or 'jokes', physical behaviour such as interfering with clothing or online sexual harassment such as the non-consensual sharing of sexual images). It 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 violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

2 Signs of abuse

2.1 Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion, particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children or young people needs to be vigilant to the signs listed below.

2.2 Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development. Children with learning difficulties, physical disabilities or health-related issues may be at a different developmental stage to most of their peers. However, children who have experienced abuse or neglect from a young age may also display developmental delays compared to children their own age. In such cases, the lack of a clear medical explanation for these delays may be an indicator of abuse.

2.3 In addition to warning signs that may be specific to a particular category of abuse or neglect, there are a number of general warning indicators which might suggest that a child is being abused or neglected as follows:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;

- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

2.4 **Physical abuse**: It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation. Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. Be vigilant to possible abuse if a child is frequently described as ill by their parent but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child's apparent condition.

Signs of physical abuse, as well as the more general indicators listed above, may include:

- Frequent injuries;
- Unexplained or unusual fractures or broken bones;
- Unexplained bruises or cuts, burns or scalds or bite marks;
- Improbable excuses or refusal to explain injuries;

- Wearing clothes to cover injuries, even in hot weather;
- Fear of medical help or examination.

2.5 **Emotional abuse**: It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained. Children also develop at different rates from one another and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child, such as those listed in 2.3 above and:

- Children who are excessively withdrawn, fearful or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child;
- Parents or carers who humiliate their child, for example by name-calling or making negative comparisons;
- Physical, mental and emotional development lags;
- Sudden speech disorders;
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc');
- Overreaction to mistakes;
- Extreme fear of any new situation;
- Inappropriate response to pain ('I deserve this');
- Neurotic behaviour, unusual or excessive nervousness (obsessive, compulsive behaviours, rocking, hair twisting, self-mutilation);
- Self-harm; and/or
- Extremes of passivity or aggression.

2.6 **Sexual abuse**: It is normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation.

Normal sexual behaviour for adolescents includes:

- Kisses, hugs, dates others, may have longer term relationships;
- Is interested in and asks questions about body parts, relationships and sexual behaviour. Is aware of the need for privacy;
- Uses sexual language and talks about sexual acts with peers;
- May look at sexual pictures including internet images;

- Masturbates in private; and/or
- Experiments sexually with adolescents of similar age.

In addition to the general indicators listed in 2.3 above, the following are possible signs and indicators of sexual abuse in adolescents:

- Displaying knowledge or interest in sexual acts inappropriate to their age;
- Using sexual language or having sexual knowledge that you would not expect them to have;
- Asking others to behave sexually or play sexual games;
- Physical sexual health problems including soreness in the genital or anal areas, sexually transmitted infections or underage pregnancy;
- Regressing to younger behaviour patterns;
- Sudden loss of appetite or compulsive eating;
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder;
- Trying to be 'ultra-good' or perfect; overreacting to criticism;
- Self-harm.

2.7 **Child Sexual Exploitation**: In addition to the general signs of abuse in 2.3 above and those specific to sexual abuse, some of the following may be indicators of sexual exploitation:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation;
- Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or becoming pregnant;
- Suffering from changes in emotional well-being;
- Misuse of drugs and alcohol;
- Going missing for periods of time from home or school or regularly getting home late;
- Regularly missing school or education or not taking part in education

2.8 **Neglect**: It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight, but is, in fact, naturally thin. Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse. However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected.

Possible signs of neglect include:

- Hunger, tiredness or poor personal hygiene;
- An indisputably dirty or unsafe home (e.g. around drugs, alcohol or violence);
- Poor state of clothing;
- Emaciation;
- Untreated medical problems;
- No social relationships;
- Compulsive scavenging;
- Destructive tendencies including anger, aggression or self-harm;
- Poor physical development e.g. delayed puberty.

2.9 **Female genital mutilation:** There are a number of factors that might indicate that a girl is at risk of FGM or that it is imminent and these are set out in full in the 'Female Genital Mutilation Multi-agency Practice Guidelines' (see Appendix 7 for a link). Signs that female genital mutilation may already have taken place include:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

3 Further guidance for staff

3.1 Possible signs of abuse that may become evident in the school environment include, but are not limited to:

3.1.1 the pupil says she has been abused or asks a question or makes a comment which gives rise to that inference;

3.1.2 there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;

3.1.3 the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;

3.1.4 the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;

3.1.5 the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;

3.1.6 the pupil appears neglected, e.g. dirty, hungry, inadequately clothed; and/or

3.1.7 the pupil is reluctant to go home, or has been openly rejected by her parents or carers.

4 Children who may benefit from early help

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

- is disabled and has specific additional needs;
- has special educational needs (regardless of whether they have a statutory EHC plan);
- is a young carer;
- is showing signs of being drawn into 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 at risk of being radicalised or exploited;
- is a privately fostered child.

5 Further Advice

5.1 Guidance on the following specific safeguarding issues is available via web-links in Annex A to *Keeping Children Safe in Education* at Appendix 7 to this policy): abuse, bullying (including cyberbullying), children and the courts, children missing from education, home

or care; children with family members in prison, child exploitation, drugs, honour based violence (so-called), health and well-being; homelessness, online/sexting, private fostering, radicalisation and violence.

5.2 Further advice on child sexual exploitation, female genital mutilation and preventing radicalisation is also available on the final page of Part 1 to *Keeping Children Safe in Education* (see the link at Appendix 7 to this policy).

Appendix 3: Guidance for staff on suspecting or hearing a complaint of abuse

1 Action staff must take

1.1 Any member of staff suspecting or hearing a complaint of abuse, including a report of peer on peer sexual violence or harassment, must recognise that the child has placed them in a position of trust. The member of staff:

1.1.1 should be supportive and respectful of the child, listen carefully, be non-judgmental and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place;

1.1.2 must not ask leading questions, i.e. a question which suggests its own answer, and only prompt the child where necessary with open questions;

1.1.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the DSL who will ensure that the correct action is taken;

1.1.4 must, subject to 1.1.3 above, maintain confidentiality and only involve those who need to be involved such as the DSL or children's social care;

1.1.5 must keep a sufficient written record of the conversation, only recording the facts as the child presents them. Best practice is to wait until the end of the report and immediately write up a thorough summary but it may be appropriate to take some notes during the conversation, particularly if there are two members of staff present (which is preferable). The record may become part of a statutory assessment by children's social care and/or part of a criminal investigation and should therefore include:

(a) the date and time;
(b) the place of the conversation; and
(c) the essence of what was said and done by whom and in whose presence;

1.1.6 must record, in writing, all concerns, discussions and decisions made and the reasons for those decisions.

1.2 The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the DSL as soon as possible. The record of what was said by the child should as far as possible be in her own words and not in the adult's reinterpretation of those words.

1.3 All evidence, for example, scribbled notes, mobile phones containing text messages, clothing and computers, must be safeguarded and preserved and passed to the DSL. Computers or other devices that might contain relevant evidence should not be searched or accessed by the member of staff hearing the complaint. Staff must not view or forward illegal images of a child.

1.4 All suspicions or complaints of abuse must be reported to the DSL as soon as possible.

1.5 If, at any point, a child is in immediate danger or there is a risk of harm a referral should be made to the local authority children's social care services immediately (see Contacts p.3-4 of the Safeguarding Policy for contact details). A referral would normally be made by the DSL but anybody can make a referral in exceptional circumstances, such as an emergency or where there is a genuine concern that appropriate action is not being taken. If a member of staff makes a referral directly, the DSL should be informed as soon as possible thereafter.

Appendix 4: Dealing with allegations against staff or volunteers

1 Introduction

1.1 Allegations of abuse are difficult and distressing for all concerned. It is essential that policies and procedures are in place to manage these cases. Underpinning these procedures are the following principles: that there should be adequate protection for the child and also that the procedures should ensure that allegations against a member of staff or a volunteer are dealt with fairly, quickly and consistently.

2 The School's procedures

2.1 The School's procedures for dealing with allegations made against staff and volunteers will be used where the member of staff or volunteer has:

2.1.1 behaved in a way that has harmed a child, or may have harmed a child;

2.1.2 possibly committed a criminal offence against or related to a child; or

2.1.3 behaved towards a child or children in a way that indicates he or she may pose a risk of harm if he or she worked regularly or closely with children.

2.2 All such allegations must be dealt with as a priority so as to avoid any delay.

2.3 Any allegations not meeting this criteria will be dealt with in accordance with the Tri-borough LSCB procedures. Advice from the LADO will be sought in borderline cases.

3 Reporting an allegation against staff or volunteer

3.1 Where an allegation or complaint is made against any member of staff (including the DSL) or volunteer, the matter should be reported immediately to the Head Mistress. In her absence, the report should be made to the DSL (unless the allegation involves the DSL) or to the Chair of Governors. The Head Mistress will in turn inform the Chair of Governors, and may also consult with the DSL and the Senior Deputy Head (Pastoral), and the allegation will be discussed immediately (within one working day) with the LADO before further action is taken.

3.2 Where an allegation or complaint is made against the Head Mistress, the matter should be reported immediately to the Chair of Governors, or in her absence the Deputy Chair of Governors, without first notifying the Head Mistress. Again, the allegation will be discussed immediately (within one working day) with the LADO before further action is taken.

3.3 The person taking action in accordance with the procedures in this Appendix (whether the Head Mistress, the DSL or the Chair of Governors) is known as the 'Case Manager'. Discussions with the LADO should be recorded in writing and any communication with the subject of the allegation or the parents or a pupil involved should be agreed.

4 Disclosure of information

4.1 The Case Manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted, subject to 4.3 below.

4.2 The Parents or carers of the child or children involved will be informed of the allegation as soon as possible if they do not already know of it, subject to 4.3 below. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.

4.3 Where the LADO advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

4.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed (see below).

5 Action to be taken against the accused

5.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate.

5.2 Where an investigation by the police or the local authority children's social care services is unnecessary, the LADO will discuss the steps to be taken with the Case Manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

5.3 It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the Case Manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Tri-borough LSCB.

5.4 Suspension

5.4.1 Suspension will not be an automatic response to an allegation and will only be considered in a case where:

(a) there is cause to suspect a child or other children at the School is or are at risk of significant harm; or

(b) the allegation is so serious that it might be grounds for dismissal.

5.4.2 Suspension will not be automatic and consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The LADO will be contacted for advice if necessary.

5.4.3 A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided.

5.5 Criminal proceedings

5.5.1 The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will

depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

5.6 **Return to work**

5.6.1 If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The School will also consider how to manage the contact with the child or children who made the allegation.

6 Confidentiality and publicity

6.1 It is extremely important that when an allegation is made, the School makes every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restrictions in response to a request to do so. These provisions commenced on 1 October 2012.

6.2 'Publication' includes 'any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public'. This means that a parent who, for example, published details of the allegation on a social networking site could be in breach of the reporting restrictions. Breach is potentially a criminal offence.

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

6.3.1 who needs to know and, importantly, exactly what information can be shared;

6.3.2 how to manage speculation, leaks and gossip;

6.3.3 what, if any, information can be reasonably given to the wider community to reduce speculation; and

6.3.4 how to manage press interest if and when it should arise.

7 Ceasing to use staff

7.1 If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

7.2 If a member of staff (or a governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by

the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.

7.3 Where a teacher has been dismissed, or would have been dismissed had he or she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency should be made in circumstances where a prohibition order may be appropriate. The reason such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. See the Teaching Regulation Agency website or DFE Guidance *Teacher Misconduct: the prohibition of teachers* (April 2018) for more information.

7.4 It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

8 Timescales

8.1 All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with all but the most exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head Mistress should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

9 Unsubstantiated or malicious allegations

9.1 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head Mistress will consider whether to take disciplinary action in accordance with the School's Behaviour Policy.

9.2 Where a parent has made a deliberately invented or malicious allegation the Head Mistress will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.

9.3 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

10 Record keeping

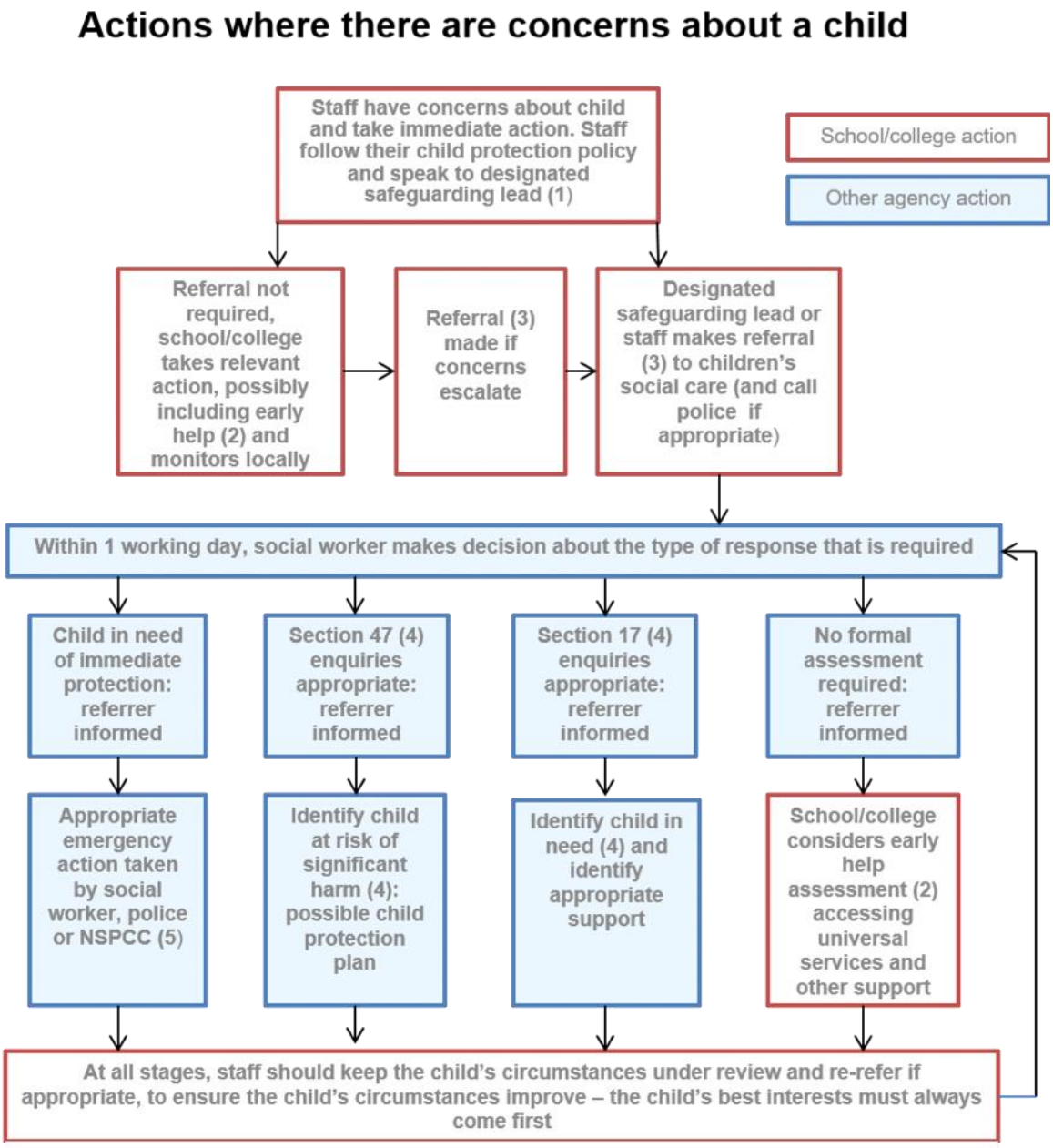
10.1 Details of allegations found to be malicious will be removed from personnel records.

10.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused and a copy provided to the person concerned. The record will be

retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer.

10.3 An allegation proven to be false, unsubstantiated, unfounded or malicious will not be referred to in employer references.

Appendix 5: Flowchart of action where there are concerns about a child (from *Keeping Children Safe in Education* (2018) – Part 1)



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working together to safeguard children provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of Working together to safeguard children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of Working together to safeguard children.

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix 6: Prevent Strategy (information and referrals flowchart)

1. What is the Prevent Strategy?

1.1. Prevent is part of the Government's counter-terrorism strategy, CONTEST. Its aim is to stop people becoming terrorists or supporting terrorism*. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

1.2. '***Extremism'*** is defined in the Prevent strategy as 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. Also included in the definition of extremism are calls for the death of members of our armed forces, whether in this country or overseas.

1.3. '***Radicalisation'*** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

1.4. Prevent work is intended to deal with all kinds of terrorist threats to the UK. The most significant of these threats is currently from terrorist organisations in Syria and Iraq, and Al Qa'ida associated groups. But terrorists associated with the extreme right also pose a continued threat to our safety and security.

* *The current UK definition of '**Terrorism'** is given in the Terrorism Act 2000. In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.*

2. The Channel Panel

2.1. Channel is an early intervention multi-agency panel designed to safeguard individuals from being drawn into extremist or terrorist behaviour. Channel is for individuals of any age who are at risk of exploitation by extremist or terrorist ideologues. The Channel Panel is chaired by the local authority and works with multi-agency partners to collectively assess the risk to an individual and decide whether an intervention is necessary.

2.2. Anyone can make a referral to the Channel Panel. A referral would normally be made by the DSL but anybody can make a referral in exceptional circumstances, such as an emergency or where there is a genuine concern that appropriate action is not being taken.

2.3. Further information about the Channel Panel can be found in the staff handbook (see also the referrals flowchart at the end of this Appendix).

3. Key Policy Changes

3.1. *Department for Education Guidance: 'Promoting fundamental British values as part of SMSC in schools'* – November 2014. Schools should promote 'acceptance and engagement with the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; pupils develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain.

3.2. *Counter-Terrorism and Security Act, July 2015*: It places the Channel programme on a statutory footing. The Act gives certain bodies, such as schools and universities, a new duty to have due regard to the need to prevent people from being drawn into terrorism.

4. Potential Indicators of Vulnerability to Extremist Ideology*

4.1. **Vulnerability**

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups.

4.2. **Access to Extremism / Extremist Influences**

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

4.3. **Experiences, Behaviours and Influences**

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying). It is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks, either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

**From 'Prevent and Channel Strategy: A Toolkit for Schools'*

5. Pastoral Approaches to the 'Prevent' Strategy within Godolphin and Latymer

5.1. The School's policies have been updated in light of the statutory guidance that has been issued. Staff are aware that if they have any concerns about a child at risk of radicalisation they should discuss this with a member of the pastoral team and if they have safeguarding concerns or are otherwise concerned that a child is at risk of harm they should report this to the DSL. The School will consider effective engagement with parents and will assist and advise families who raise concerns.

5.2. The pastoral curriculum within form time and PSHE highlights ways in which British Values are delivered to students, as do the SMSC approaches of each academic department which are highlighted in department handbooks. Assemblies, talks by external speakers for PSHE, school trips and extra-curricular activities also actively promote British Values. Structures such as School Council enhance students' awareness of democratic processes.

5.3. The Senior Deputy Head (Pastoral), the Heads of Sections and Deputy Heads of Sections received training from Prevent on 16th March 2015, details of which were fed back to staff by the SDH in Briefing on 29th April. Representatives from each section as well as the medical team, the DSL for Safeguarding and the Senior Deputy Head (Pastoral) received further training from Prevent in spotting potentially concerning signs of radicalisation within students on 1st July 2015.

6. Further Information

6.1. Hammersmith and Fulham provide further information for teachers at:

www.lbhf.gov.uk/preventandschools

6.2. The following link provides further information and training on the Prevent Strategy and the duties that public bodies have in being vigilant about ensuring that students are safeguarded from extremist ideology:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

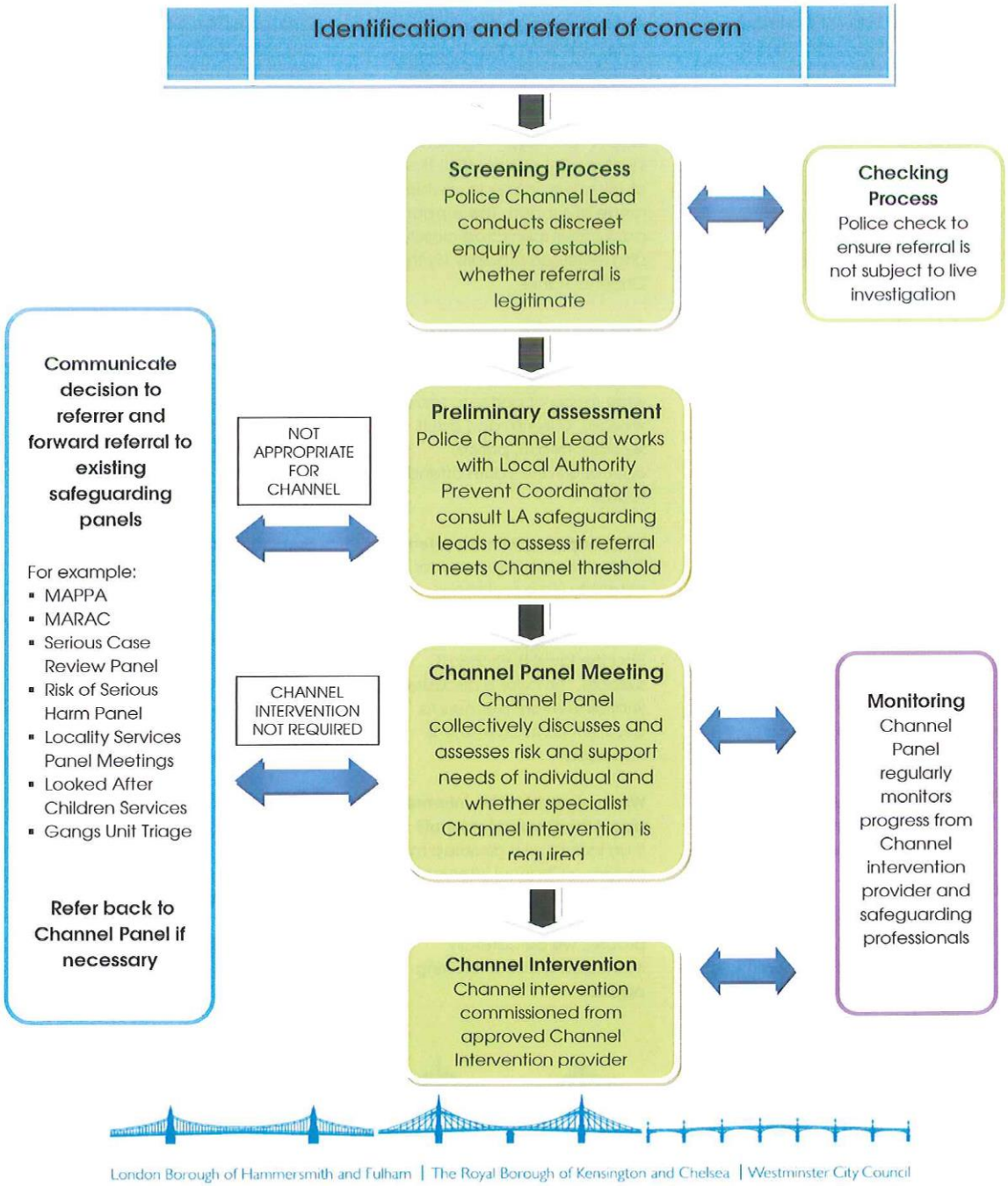
6.3. A Government briefing note regarding the use of social media for online radicalisation can be found here:

https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

6.4. The Government has launched 'educate against hate', a website designed to equip school staff and parents with the information, tools and resources needed to recognise and address extremism and radicalisation in young people. Please click here.

6.5. For the Prevent Strategy and Channel Panel Referrals Flowchart, please see overleaf.

The Prevent Strategy and the Channel Programme



Appendix 7: Further Guidance

Please click on the links or go to www.gov.uk for the documents listed below and more information.

Keeping Children Safe in Education (September 2018) – Part 1 and full document

Working Together to safeguard Children (July 2018)

What to do if you are worried a child is being abused (March 2015)

Information Sharing: Advice for Practitioners (July 2018)

Prevent Duty Guidance for England and Wales (July 2015)

The Prevent Duty (for schools and childcare providers) (June 2015)

The Use of Social Media for Online Radicalisation (July 2015)

Female Genital Mutilation Guidelines (July 2014)

Sexting in schools and colleges: responding to incidents and safeguarding young people *(August 2016)*

Full Tri-Borough LSCB Procedures can be found at: http://www.londoncp.co.uk/

Local Authority Thresholds of Need Guide

The Safer Recruitment Consortium has recently updated original DfES Guidance on Safe Working Practice for professionals working in education settings. The revised guidance can be found here:

Guidance for Safe Working Practice (October 2015)