

Safeguarding (child protection) policy

Action	Policy to be reviewed as required and at least annually		
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School website	✓



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1. Policy statement

- 1.1. All the School's Governors are responsible for ensuring that mechanisms are in place to assist staff to understand and discharge their safeguarding responsibilities. This policy has been authorised by the Governors, is addressed to all Governors, members of staff and volunteers, is available to parents on request and is published on the School website. This policy can be made available in large print or other accessible format if required. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit. All adults in the school community are responsible for safeguarding and promoting the welfare of children.
- 1.2. Safeguarding and promoting the welfare of children (everyone under the age of 18) is defined in the DfE's *Keeping Children Safe in Education* (September 2018) 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 in the best interests of the child to ensure the best outcomes.
- 1.3. Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse, neglect, and includes peer on peer abuse (for further information see 5.1 and Appendix 3). All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs.
- 1.4. There is an important distinction between safeguarding children who have suffered or are likely to suffer significant harm (where cases should be reported to children's social care immediately) and action required to promote the welfare of children in need of additional support even if they are not suffering harm or are at immediate risk. Interventions for children in need may include CAMHS (Children and Adolescent Mental Health Services); TAC (Team Around the Child); TAF (Team Around the Family).

2. Principles

- 2.1. St Paul's Girls' School (the **School**) is committed to safeguarding and promoting the welfare of children and young people and expects **all** staff, Governors and volunteers to share this commitment. We recognise that children have a fundamental right to be protected from harm and that pupils cannot learn effectively unless they feel secure. We therefore aim to provide a school environment which promotes self-confidence, a feeling of self-worth and the knowledge that pupils' concerns will be listened to and acted upon.

The School will take all reasonable measures to:

- ensure that we practise **safer recruitment** in checking the suitability of staff and volunteers (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in *Keeping Children Safe in Education* (September 2018) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the School's **Recruitment and selection policy** available on the staff portal or on request from the school office.
- ensure that we carry out all necessary checks on the suitability of people who serve on the School's governing body in accordance with the above regulations and guidance given in *Keeping Children Safe in Education* (September 2018)
- ensure that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children, a detailed report is made to

the Disclosure and Barring Service (**DBS**) as soon as possible after the person has ceased to provide services to the School and in any event within one month of the person leaving the school. This includes dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. Where a dismissal does not reach the DBS referral threshold, consideration will be given to making a referral to the Teaching Regulation Agency (TRA) (previously National College of Teaching and Leadership (NCTL)). Reasons for making such a referral would include: unacceptable professional conduct; conduct that may bring the profession into disrepute; or a conviction, at any time, for a relevant offence

- ensure that where staff from another organisation are working with our pupils on another site, we have received written confirmation that appropriate child protection checks and procedures apply to those staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members to work with children
- ensure that its safeguarding arrangements follow the procedures and practice of the Borough Local Safeguarding Children Board (LSCB) (or other LSCB as may be appropriate) as part of the inter-agency safeguarding procedures set up by it. The Borough's procedures are published and frequently updated on a dedicated website at: [link](#)
- ensure that early help support is provided as soon as a problem emerges
- protect each pupil from any form of abuse, whether from an adult or another pupil or child
- be alert to signs of abuse both in the School and from outside
- deal appropriately and promptly with every suspicion or complaint of abuse and to consider, at all times, what is in the best interests of the child
- design and operate procedures which promote this policy
- design and operate procedures which, so far as possible, ensure that teachers and others within the School community who are innocent are not prejudiced by false allegations
- support pupils who have been abused in accordance with their agreed child protection plan where these are in place
- be alert to the medical needs of children with medical conditions
- operate robust and sensible health and safety procedures
- take all practicable steps to ensure that School premises are as secure as circumstances permit
- have regard to statutory guidance issued by the Secretary of State for Education (**DfE**) in accordance with section 175 of the Education Act 2002 and associated regulations.
- review and consider how pupils should be taught about safeguarding.
- identify children who may be vulnerable to radicalisation, and know what to do when they are identified in order to fulfil the Prevent duty; and
- ensure that all governors and staff are aware of their responsibilities with regards to safeguarding through appropriate training which is regularly renewed, and other annual updates.

3. Child protection procedures - summary

Every complaint or suspicion of abuse from within or outside the School will be taken seriously and in line with published local thresholds ([link](#)) will be referred to an external agency such as the children's social care department in the relevant local authority or the child protection unit of the police, without investigation within the School. In these cases, the following referral procedures apply:

- if the allegation is against a member of staff, the Designated Safeguarding Lead or a professional person connected to the School, the allegation should be reported to the High Mistress immediately. The matter will be referred by the High Mistress or the Designated Safeguarding Lead to the Local Authority Designated Officer (**LADO**) within one working day. If the Designated Safeguarding Lead is making the referral, she will keep the High Mistress informed. Any doubts or concerns may be discussed informally with the LADO, initially on a "no names" basis.
- if the allegation is against the High Mistress, the person receiving the allegation should immediately inform the Chair of Governors, or in his absence the Deputy Chair. The High Mistress must not be informed of the allegation prior to contact with the Chair and the LADO. The Chair of Governors, or in his absence the Deputy Chair, will liaise with the LADO and relevant agencies as required. If an allegation is made against the Chair of Governors or another Governor, the allegation should be reported to the High Mistress. In either case, any such allegations will be discussed with the LADO within one working day before further action is taken
- if the allegation does not involve a member of staff or a professional person and the child has suffered harm or is at risk of harm, the matter will be referred by the Designated Safeguarding Lead **to children's social care department where the child lives**. Advice and informal consultation over apparently borderline cases may be discussed with the **Hammersmith and Fulham Family Services Front Door** team in the first instance and initially on a "no names" basis.

4. Management of Child Protection matters

- 4.1. The Board of Governors ("the Board") takes seriously its responsibility to uphold the aims of the charity and its duty in promoting an environment in which children can feel secure and safe from harm. **The nominated Governor for safeguarding is Geeta Khehar**. She instigates a review of the school's safeguarding procedures on behalf of the Board and reports to the Board annually, making any recommendations for improvements. The nominated Governor also discusses safeguarding matters with the Designated Safeguarding Lead at least termly and reports to the Board at each meeting.
- 4.2. The Board of Governors should ensure an appropriate senior member of staff, from the senior management team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. The **ultimate lead responsibility** for safeguarding and child protection remains with the designated safeguarding lead.
- 4.3. The High Mistress is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis.
- 4.4. The School has appointed a senior member of staff with the necessary status and authority (**designated safeguarding lead**) to be responsible for matters relating to child protection and welfare. Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the school, whether these concerns relate to their own child or any other. If preferred, parents may discuss concerns in private with the child's form teacher or the High

Mistress who will notify the Designated Safeguarding Lead in accordance with these procedures.

4.5. The main responsibilities of the Designated Safeguarding Lead are:

- to be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection
- to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- to refer all cases of suspected abuse to the local authority children's social care
- to co-ordinate the child protection procedures in the School
- to maintain an ongoing training programme for all School employees, Governors, volunteers and other individuals working at the school, including induction training for all such individuals, and provide regular updates
- to monitor the keeping, confidentiality and storage of records in relation to child protection which are kept separate from pupil records.
- to ensure that notification of further record keeping is marked on the pupil records
- to liaise with the Local Authority Designated Officer (LADO) where appropriate, and the Contact and Assessment Service
- to keep parents informed of action to be taken under these procedures in relation to their child in accordance with section 12 of this policy
- to liaise with the High Mistress to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- to monitor records of pupils in the School who are subject to a child protection plan to ensure that this is maintained and updated as notification is received
- to liaise with other professionals to ensure that the School contributes to inter-agency working in line with Working Together to Safeguard Children (July 2018). This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children who are subject to child protection plans
- to ensure that locally agreed inter-agency procedures put in place by the Borough LSCB (and any other LSCB as appropriate) are followed
- to advise and act on all suspicions, concerns and/or evidence of the need for children to receive additional support, or of children who have suffered or are likely to suffer abuse and/or neglect, which is reported to the Designated Safeguarding Lead
- where appropriate, to take part in child protection conferences or reviews
- to inform social services in writing when a child who is subject to a child protection plan moves to another school and to ensure the secure transfer of the child protection file to the pupil's new school (and that it is sent separately from the main pupil file)
- keep and maintain records of staff training on child protection and safer recruitment procedures

- to notify the Disclosure and Barring Service if the School ceases to use the services of a member of staff (or a governor or volunteer) because they are unsuitable to work with children and;
- to liaise with the local Channel Panel if a child is deemed to be at risk of radicalisation.

The DSL or DDSL should always be available to discuss safeguarding concerns during school hours. If in exceptional circumstances, the DSL or DDSL are not available, this should not delay appropriate action being taken. Staff should consider speaking to the Senior Deputy Head or the High Mistress. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as practically possible.

Outside term time, the DSL and DDSL will operate a rota during the holidays.

4.6. The Designated Safeguarding Lead for the School site is **Sandrine Paillasse** (Deputy Head, Director of Pastoral Care) who may be contacted on 020 7605 4892.

She will:

- advise and act promptly upon all suspicion, belief and evidence of abuse reported to her
- keep the High Mistress informed of all actions unless the High Mistress is the subject of a complaint. In this situation, the Designated Safeguarding Lead should consult with The Hon Timothy Palmer, Chairman of Governors or in his absence, Ms Kate Bingham, the Deputy Chairman of Governors, without notifying the High Mistress first; and
- liaise with social services and other agencies on behalf of the School.

4.7. If the Designated Safeguarding Lead is unavailable her duties will be carried out by one of the Deputy Designated Safeguarding Lead who have received appropriate training. The Deputy Designated Safeguarding Leads are **Helen Semple** (Deputy Head, Director of People and Diversity) who may be contacted on 020 7605 1118 and **Josephine Lane** (Director of Senior School) who may be contacted on 020 7605 4817.

The Designated Safeguarding Lead and her deputies have undertaken Level 3 child protection training and training in inter-agency working and will attend refresher training at two-yearly intervals. The Designated Safeguarding Lead has the appropriate authority and has been given the necessary time, funding, training, resources and support to carry out this role.

5. Types of abuse

5.1. The definition of 'child abuse' is wide in order to cover all forms of cruelty that children may endure in their lives. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They 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. There are four types of child abuse which are commonly identified as:

- **physical abuse** is 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** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or 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, serious bullying (including cyberbullying), causing children to feel frightened or in danger frequently, 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 young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section 12 of this policy).
- **neglect** is the persistent failure to meet a child's basic and/or psychological needs, likely to result in the serious impairment of health or development. 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.

5.2. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

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

Children with special educational needs may require more specific approaches to enable them to build safety skills, including online safety.

Further guidance is given at Appendix 3.

6. Signs of abuse

6.1. Possible signs of abuse include the following (but are not limited to and do not necessarily mean that abuse is occurring).

- the pupil says she has been abused or asks a question which gives rise to that inference

- there is no reasonable or consistent explanation for a pupil's injury (including cuts, bruises, burns); the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries
- the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour. For example, they may become aggressive, challenging, disruptive, withdrawn or clingy
- the pupil does not want to change clothes in front of others or participate in physical activities
- the pupil is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- the pupil talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the pupil has poor school attendance or punctuality
- the pupil is regularly missing from school or education
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the pupil's development is delayed in terms of emotional progress
- the pupil suddenly loses or gains weight
- the pupil drinks alcohol regularly from an early age
- the pupil is concerned for younger siblings without explaining why
- the pupil talks about running away
- the pupil shies away from being touched or flinches at sudden movements
- the pupil demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the pupil appears neglected, e.g. dirty, hungry, inadequately clothed; poor hygiene
- the pupil is reluctant to go home, or has been openly rejected by her parents or carers
- parents are dismissive and non-responsive to teachers' concerns
- parents or carers blame their problems on their child and
- parents who fail to seek medical treatment when their child is ill or injured.

6.2. Signs of grooming, sexual exploitation or sexual abuse

The signs of grooming aren't always obvious. Groomers will also go to great lengths not to be identified. Children may:

- be very secretive, including about what they are doing online
- display knowledge or interest in sexual acts inappropriate to their age
- have older boyfriends or girlfriends
- go to unusual places to meet friends
- have new belongings such as clothes or mobile phones that they can't or won't explain
- ask other to behave sexually or play sexual games
- have access to drugs and alcohol.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

Further guidance is given at Appendix 3. Staff will also find it useful to refer to the DfE's guidance *What to do if you're worried a child is being abused* (March 2015).

7. Preventing Radicalisation

- 7.1. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined as vocal or active opposition to fundamental values, including the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- 7.2. All staff are subject to the Prevent duty: they must have due regard to the need to prevent people from being drawn into terrorism.
- 7.3. **Signs of radicalisation:** 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. Background factors may contribute to vulnerability which are often combined with background influences such as family, friends or online, and with particular needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. Signs may include children:
 - Isolating themselves from family and friends
 - talking as if from a scripted speech
 - unwillingness or inability to discuss their views
 - a sudden disrespectful attitude towards others
 - increased levels of anger
 - increased secretiveness, especially around internet use

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination.

As with managing 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 professional judgement in identifying children who might be at risk of radicalisation and act proportionately. This may include making a referral to the Channel programme and possibly to children's social care where the child lives through the Designated Safeguarding Lead with whom they should discuss their concerns. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

- 7.4. **Risk assessment:** The school has assessed the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- 7.5. **Working in partnership:** The Designated Safeguarding Lead will continue existing partnership arrangements and keep open lines of communication with the Local Safeguarding Children's Board.
- 7.6. **Staff training:** The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads have undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have been made aware of the Prevent Duty through in-house training.
- 7.7. **IT:** Suitable filtering is reviewed to keep pupils safe from terrorist and extremist material when accessing the internet in school.

7.8. **Online Safety:** online safety is explicitly addressed in the staff induction process for new staff; staff are regularly updated through tutor meetings and staff meeting. Online safety features in our PSHEE programme for students.

7.9. **Procedures:** If a member of staff is concerned that a pupil may be exposed to radicalisation the normal referral processes apply i.e. they should discuss it with the Designated Safeguarding Lead who will follow the safeguarding procedures outlined in this policy and may also make a referral to the Channel programme. Borderline cases will be discussed with the Channel Panel on a no-names basis

8. Online Safety

8.1. The use of technology is a significant component of many safeguarding issues. The breadth of issues classified within online safety can be categorised into three areas of risk:

8.1.1. Content: being exposed to illegal, inappropriate or harmful material;

8.1.2. Contact: being subjected to harmful online interaction with other users; and

8.1.3. Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

8.2. The Governing Board should be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. The school should have appropriate filters and monitoring systems in place, and give due consideration to the pupils' age range, their frequency of access and the proportionality of costs vs risks.

9. Responsibility of all staff, governors and volunteers

9.1. Every employee and Governor of the School as well as every volunteer who assists the School is under a general legal duty:

- To protect children from abuse
- To be able to identify welfare concerns amongst the pupils and to be able to identify pupils who are in need of additional support
- To be aware of the school's child protection procedures and to follow them
- To know how to access and implement the procedures, independently if necessary
- To keep a sufficient record of any significant complaint, conversation or event; and
- To report any matters of concern to the Designated Safeguarding Lead.

9.2. Training

All staff will undertake appropriate training including refresher training in accordance with advice provided by the Local Safeguarding Children Board (LSCB) for Hammersmith & Fulham (every two years). In addition, all staff members will receive safeguarding and child protection updates (via email, e-bulletins, staff meetings) as required, but at least annually.

All new staff, including temporary staff and volunteers are provided with induction training that includes this policy (which contains how to contact the Designated Safeguarding Lead), the Staff Code of Conduct, the Staff Acceptable Use of IT policy, the Whistleblowing policy, the identity of the Designated Safeguarding Lead and a copy of Part 1 and Annex A of the DfE's *Keeping Children Safe in Education* (September 2018). All staff are required to read Part 1 and Annex A of this guidance

each time it is updated. SMT and the e-safety coordinator should read Annex C (Online Safety) of this guidance.

- 9.3. Online safety training should be integrated, aligned and considered part of the overarching safeguarding approach. It is a component of new staff induction. All students ought to be taught about online safeguarding.
- 9.4. **Whistleblowing:** All staff are required to report to the High Mistress (or if she is not available and the matter is urgent, a member of the Senior Management Team) any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. If the member of staff feels unable to raise their concern with the High Mistress (or a member of SMT), they should contact the Chair of Governors. Where a member of staff feels unable to raise an issue with the High Mistress or the Chair of Governors or feels that their genuine concerns are not being addressed, they may contact the [NSPCC whistleblowing advice line](#). 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. Malicious allegations may be considered as a disciplinary offence. Further detail on whistleblowing procedures is outlined in the School's Whistleblowing policy.

10. Procedures for receiving a complaint of abuse

- 10.1. **Initial complaint:** A member of staff, Governor or volunteer suspecting or hearing a complaint or suspicion of abuse must;
- **stay calm and sympathetic.** Listen carefully to the child and keep an open mind. Staff, Governors or volunteers should not take a decision as to whether or not the abuse has taken place
 - not ask leading questions, that is, a question which suggests its own answer. Ask open questions that will encourage a secure and sympathetic environment for the child, such as "is there anything else you want to tell me?"
 - **reassure** the child but not give a guarantee of absolute confidentiality. The member of staff, Governor or volunteer should explain that they need to pass the information to a member of staff who will ensure that the correct action is taken. Staff, Governors or volunteers should not make promises that they can't keep such as 'everything will be alright' but clearly explain what they have to do next and who they will talk to
 - keep a sufficient and accurate written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. 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 Designated Safeguarding Lead as soon as possible and;
 - not take any further action unless specifically requested by the Designated Safeguarding Lead or the High Mistress.
 - only share information on a need-to-know basis and must not discuss the matter.
- 10.2. **Female Genital Mutilation (FGM):** Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher discovers that an act of FGM appears to have been carried out on a girl aged under 18, the teacher must report it to the police. There is a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available on p80 of Keeping Children Safe in Education *Annex A* (September 2018).

10.3. **Sexting:** sexting is defined as the production of and/or sharing of sexual photos and videos of and by young people who are under the age of 18. Staff who are aware of an incident involving sexting should:

- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
- Report it to the DSL, if you have already viewed the imagery by accident.
- Not delete the imagery or ask the young person to delete it.
- Not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Not share information about the incident to other members of staff, the young person(s) it involved or their, or other, parents.
- Not say or do anything to blame or shame any young people involved.
- Explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

10.4. **Preserving evidence:** All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

Reporting: All suspicion or complaints of abuse must be reported to the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads, or if the complaint involves a member of staff, to the High Mistress. Details of procedures for reporting allegations against members of staff are given at section 10 and Appendix 2.

If in exceptional circumstances you are not able to speak to the Designated Safeguarding Lead, the Deputy Designated Safeguarding Leads or the High Mistress, you should speak to your manager. If there is risk of immediate serious harm to a child and you are not able to follow this referral procedure, contact the Hammersmith and Fulham Family Services Front Door team or the social services department where the child lives (see section 15 for contact numbers). If there is an immediate emergency, dial 999 and report the matter to the police.

10.5. Members of staff must, as soon as possible after making a report, complete the Reporting Form which can be found at Appendix 1.

10.6. **Action by the Designated Safeguarding Lead on receiving a notification of concern. The Designated Safeguarding Lead will, when taking action:**

- Clarify the issues with the person raising the concern
- Refer the matter to the High Mistress to agree on the next steps, depending on the seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to social services and the police immediately
- Consider the wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes
- Consider the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, she may take further advice from the

relevant professionals before informing parents. A disclosure to children's services may be made without prior contact with a child's parents.

- Depending on the nature of the disclosure, advice will be sought from social services as to when to notify the complainant's parents.
- Consider duties of confidentiality, so far as applicable.

10.7. **Types of referral**

There are different types of referral procedures according to the nature of the disclosure made.

- Where a child has suffered or is at risk of harm and the matter does not involve a member of staff, a referral will be made to children's social care where the child lives **within 24 hours**. Where there are concerns about a member of staff's suitability to work with children, a referral will be made to the LADO. When deciding whether to make a referral, the High Mistress and Designated Safeguarding Lead will not draw their own conclusions over what appear to be borderline cases and if there is room for doubt as to whether a referral should be made, and depending on the nature of the case, the Designated Safeguarding Lead will consult with either the LADO or the Hammersmith and Fulham Family Services Front Door team, without identifying the family.
- If the child is considered to be a concern and is not at risk of suffering immediate significant harm but requires additional support, the Designated Safeguarding Lead will refer the child to children's social services department where the child lives. Where a child and family would benefit from coordinated support from more than one agency (for example education, health, housing, police) there should be an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The school will coordinate with the local inter-agencies involved.
- As soon as concern exists that a child may be at risk of significant harm, a referral will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to social services **within 24 hours**. If no response or acknowledgment is received within three working days, the Designated Safeguarding Lead will contact social services again.
- Where a disclosure relates to the mental health of a girl and she is at risk from herself rather than a third party, the Designated Safeguarding Lead will follow the procedures outlined in the mental health and wellbeing policy. In such cases, parental consent is sought and referrals may be made to CAMHS or private health care professionals.
- Where a child is deemed to be at risk of radicalisation, the above procedures will be followed and a referral may also be made to the Channel programme.

10.8. **Inter-agency working:** The School will work with external agencies and in accordance with guidance outlined in *Working together to Safeguard Children* (July 2018). This will include contributing to inter-agency plans to provide additional support to children subject to child protection plans and allowing necessary access for children's social care. If required, the school will also supply information to the Borough LSCB (or other LSCBs as may be appropriate) so that it can perform its function as required under the Children Act 2004.

11. Mandatory notification of questionable / defined conduct

11.1. All teachers and staff are mandated to notify the Designated Safeguarding Lead:

- 11.1.1. of any conduct that they suspect may be inappropriate (whether in isolation, or as part of a pattern);
- 11.1.2. this general duty will include certain defined conduct, such as:
 - 11.1.2.1. unsupervised access to a child in changing, sleeping on non-public accommodation at the school or on school trips;
 - 11.1.2.2. the use of sexually inappropriate language, references of jokes; and
 - 11.1.2.3. and other private communication outside of the school's defined social and social media policies.

12. Allegations against staff

- 12.1. The School has procedures for dealing with allegations against staff (and Governors or 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, Governors and volunteers from false or unfounded allegations. These procedures (which are set out fully in Appendix 2) follow part four of *Keeping Children Safe in Education* (September 2018) and will be used where the member of staff, Governor or volunteer has:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- 12.2. **Staff guidance:** 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. Staff should be particularly careful in situations where they are alone with pupils providing one-to-one tuition. This guidance is conveyed at safeguarding training for staff and a *Staff Code of Conduct* document is issued to staff and published on the staff portal.
- 12.3. **Any concern about a member of staff should be raised with the High Mistress immediately regardless of how unlikely it seems that there would be any substance to the concern.** No further action may be necessary but it is important that the information is brought to the attention of the High Mistress in the first instance.

13. Allegations against pupils (peer on peer abuse)

- 13.1. All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but is not limited to, bullying (including cyberbullying), gender-based violence/sexual violence and harassment, physical abuse, sexting and initiating/hazing type violence and rituals. Staff should always be clear that abuse is abuse and should never be tolerated or passed off as a “banter” or “part of growing up” and should be aware of the importance of challenging such behaviours. Tolerating or dismissing such behaviours risks normalising them.
- 13.2. All staff should be aware that the use of technology may present a potential risk to members of the community (e.g. Child Sexual Exploitation; radicalisation). They should familiarise themselves with the Staff Code of Conduct, the Anti-bullying policy and the ICT Code of Conduct for Pupils.
- 13.3. All staff should be clear as to the school's policy and procedures with regards to peer on peer abuse. Where an allegation of abuse against one or more pupils has been made or where a member of staff, Governor or volunteer is concerned

about peer on peer abuse, the child protection procedures set out in this policy should be followed and the Designated Safeguarding Lead informed. All allegations will be recorded in CPOMS. The pupil(s) accused of abuse and the victim of abuse will both be treated as at risk and a referral will be made to children's social care in respect of either child if that child is suffering or is at risk of harm.

- 13.4. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour will apply. The School will take advice from the Hammersmith and Fulham Contact and Assessment Service on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.
- 13.5. 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 Hammersmith and Fulham Contact and Assessment Service, 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 guardian will be requested to provide support to the pupil.
- 13.6. Support for those involved in peer on peer abuse (both parties) will be offered through the school counselling service, with regular monitoring by the Designated Safeguarding Lead. If children's social care have been involved then support may be provided through the Early Help or wider safeguarding team.
- 13.7. The PSHE programme provides opportunities to teach students about online safety, bullying and peer relationships.
- 13.8. Pupil voice opportunities (such as specific societies and the school council) should address the issues of peer on peer abuse, and are an integral element to the school's procedures to minimise the risk of peer on peer abuse.

14. Informing parents

- 14.1. Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the LADO and / or children's social care, the police and / or the High Mistress before discussing details with parents.

15. Confidentiality and information sharing

- 15.1. When considering what information to share, the protection of the child must always be the most important consideration. Whilst the Data Protection Act 2018 and GDPR place duties on organisations and individuals to process personal information fairly and lawfully, the legislation does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not stand in the way of the need to safeguard and promote the welfare of children at risk. Information which is relevant to safeguarding will often be 'special category' data; it is therefore treated as confidential personal data and stored / shared in a secure way. Further advice can be found in the document [Information Sharing](#), published by the Government in July 2018.
- 15.2. Pupil child protection records: 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 social services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 and in accordance with the requirements of Working together to safeguard children (July 2018). The Designated Safeguarding Lead

will ensure that if a pupil who is subject to a child protection plan moves to another school, their child protection file will be transferred securely (and sent separately from the main pupil file) to a designated contact at the new school and confirmation of safe receipt obtained.

- 15.3. **Allegations against staff:** Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and social services to agree the information that should be disclosed and to whom.

16. Other safeguarding arrangements

- 16.1. Beyond the child protection procedures outlined in this policy, the School has put in place arrangements to safeguard pupils and to promote their welfare. These include the following:
- 16.2. **Safer recruitment:** The School takes seriously its responsibility to recruit staff, Governors and volunteers that are suitable to work with children. The Recruitment and selection policy sets out the recruitment procedure from start to finish and outlines the checks that are carried out on staff, supply staff and other individuals that may work at the school. The Volunteer Management policy specifically addresses safeguarding procedures for volunteers working at the school.
- 16.3. **Safeguarding on educational visits:** The School will undertake the necessary safeguarding checks in accordance with guidance given in the DfE's Keeping Children Safe in Education (September 2018) as outlined in the Educational Visits Policy. The School reserves the right to exclude a pupil from a visit on medical/mental health and wellbeing grounds.
- 16.4. **Listening to pupils:** The School provides a range of opportunities for pupils to be listened to. Tutor groups throughout the School are small (typically 10 or 11 pupils) and there is regular contact time between tutor and tutees at daily registration and for extended tutor periods twice a week. Weekly PSHE lessons are usually led by tutors. A 'Who can I talk to?' document outlines the support system within the School and identifies key members of staff in the pastoral team, including medical staff. This document is available to view on the portal and on all tutor room noticeboards.
- 16.5. **Medical Staff and wellbeing team:** The school employs two part-time nurses during term time. The school doctor works on site two half days a week. In addition, the school employs an art therapist (one day a week), two counsellors (covering two days) and a wellbeing coach (two days a week). Pupils may self-refer to the nurse, doctor or any of the counsellors or coach. Parental permission is sought for referrals to external CAMHS services.
- 16.6. **Teaching pupils about safeguarding:** Pupils are taught about a range of safeguarding issues (including online safety, substance misuse, child sexual exploitation, grooming, mental health, self-harm and bullying) through their tutorial sessions, in PSHE lessons and by visiting speakers. Pupils are taught how to identify risks and how to adjust their behaviour in order to mitigate these risks and build resilience. Certain safeguarding issues are covered in the delivery of Relationships and Sex Education (SRE). Resilience to radicalisation is taught through PSHE by promoting fundamental values and enabling pupils to challenge extremist views.
- 16.7. Suitable filtering and monitoring is in place to protect pupils from online abuse.
- 16.8. **Missing pupils:** A child going missing from education is a potential indicator of abuse. Pupils are registered in accordance with DfE requirements and the school has procedures in place to deal with pupils that go missing either from school or on a school trip. These procedures are outlined in the Missing pupil policy.

- 16.9. **Risk assessment:** The School recognises that the evaluation of risks and putting in place steps to mitigate against these risks contributes to promoting the welfare and protection of pupils. For hazardous activities and curricular and co-curricular activities that may pose specific risks, risk assessments are carried out in accordance with the School's Health and Safety policy and reviewed as required by the School's Health and Safety Committee. Risk assessments for school trips and visits are reviewed by the Director of Co-Curriculum (Educational Visits Coordinator). Pupils who are at risk of harm are either referred to external agencies in accordance with these procedures and/or if the pupil is at risk of harm from herself, the Designated Safeguarding Lead will assess the risk and may put in place an Individual Care Plan (ICP) that may be shared with relevant teachers.
- 16.10. **Visitors:** The School has a Visitors policy which outlines procedures for managing visitors on site. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. All visitors are given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the School premises.
- 16.11. **School premises:** The School takes all practicable steps to ensure that School premises are as secure as circumstances permit.
- 16.12. The following policies should be read in conjunction with this Safeguarding (Child Protection) policy:
- Anti-bullying
 - Behaviour (including rewards and sanctions)
 - Educational visits
 - Health and Safety and Instruction Notices
 - ICT Code of Conduct for Pupils (including staying safe online)
 - Learning Support
 - Missing pupil
 - Mental Health and Wellbeing
 - Substance Misuse Management and Education
 - Pupil Search and Confiscation
 - E-safety
 - Recruitment and selection (available on staff portal or on request from the school office)
 - Staff Code of Conduct (available on staff portal or on request from the school office)
 - Volunteer management (available on staff portal or on request from the school office)
 - Visitor's policy (available on staff portal or on request from the school office)
 - Whistleblowing policy (available on staff portal or on request from the school office)

17. Monitoring and review

- 17.1. Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the School (which will include a review of this policy) to determine whether any improvements can be made to prevent a similar event from occurring in the future. 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. This will include a review of the School's co-operation and communication with local agencies.
- 17.2. In addition, the Designated Safeguarding Lead will monitor the operation of this policy and its procedures.

17.3. The Governors will undertake an annual review of this policy and the School's safeguarding procedures. The Governor conducting the annual review on behalf of the Board, will meet with the Designated Safeguarding Lead and other senior staff and take into account any issues raised as a result of any review within the School. The outcome of the review is reported to the Board annually. As part of their review, Governors will monitor how efficiently duties have been discharged and will make recommendations for any changes to policy and procedures necessary.

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

18.Key Contacts

Role	Name	Telephone	Email
Designated Safeguarding Lead	Sandrine Paillasse (Director of Pastoral Care)	020 7605 4892	directorofpastoralcare@spgs.org
Deputy Designated Safeguarding Lead	Helen Semple (Director of People and Diversity)	020 7605 1118	Helen.semple@spgs.org
Deputy Designated Safeguarding Lead	Josephine Lane (Director of Senior School)	020 7605 4817	Josephine.lane@spgs.org
High Mistress	Sarah Fletcher	020 7605 4801	hmpa@spgs.org
Chairman of Governors	The Hon Timothy Palmer	Tim.palmer@spgs.org Geeta.khehar@spgs.org	
Governor with responsibility for Safeguarding	Geeta Khehar	You may also contact the Secretary to the Governors, Mrs Nicki Goodfellow:	
Deputy Chair of Governors	Kate Bingham	St Paul's Girls' School, Brook Green, London, W6 7BS Telephone: 0207 605 1125 or out of hours: 07887 401 915	

The telephone numbers of the Hammersmith and Fulham children and family care services are as follows:

Role	Name	Telephone	Email
Hammersmith and Fulham Duty Line		020 8753 5125 020 8753 6600 Out of hours: 020 8748 8588	
Safer Organisations Local Authority Designated Officer (LADO) and Safeguarding Education Manager (London Borough Hammersmith and Fulham)	Megan Brown	Direct Line: 020 8753 2259/main office number: 020 8753 5125 Mobile phone 0777667302	lado@lbhf.gov.uk megan.brown@slbhf.gov.uk
Head of Safeguarding Review	Anna Carpenter	020 8753 5124	anna.carpenter@lbhf.gov.uk
Safeguarding & Child Protection Schools & education Officer	Hilary Shaw	020 7598 4876	Hilary.Shaw@rbkc.gov.uk
Contact and Assessment	Duty social worker	020 8753 5514 / 6952 / 5536	
Multi-Agency Safeguarding Hub (MASH)	Nasheen Singh	020 7641 3986/07508 004 125	nsingh@westminster.gov.uk
Private fostering - referrals and advice	David Stoffell	020 7641 7274	dstoffell@westminster.gov.uk
Child Sexual Exploitation advice Family Support	Emily Harcombe	020 8753 5124/07775 554 389	emily.harcombe@lbhf.gov.uk
FGM advice	Rochell-Ann Naidoo	020 7641 7564	rnaidoo@westminster.gov.uk

Prevent/counter-extremism contacts

Prevent Manager (Education and Projects)	Jake Butterworth	020 8753 5843 07747781056	jake.butterworth@lbhf.gov.uk
LBHF & RBKC Channel Panel Referrals (Local Head of Prevent)	Pinakin Patel	020 8753 5727	Pinakin.patel@lbhf.gov.uk
Local Police Force	Hammersmith and Fulham	101 (non-emergency) 999 (emergency)	

Anti-Terrorist Hotline		0800 789 321	
DfE dedicated non-emergency helpline		020 7340 7264	counter-extremism@education.gsi.gov.uk

Other local authorities

Below are contact details for children's social care for authorities near to the School:

Local Authority	Working hours	Out of hours
Brent	020 8937 4300	020 8863 5250
Camden (North)	020 7974 6600	020 7974 4444
Camden (South)	020 7974 4094	020 7974 4444
Ealing	020 8825 8000	020 8825 8000 <i>or</i> , 5000
Hounslow	020 8583 3456 (child protection) 020 8583 3300 (social services)	020 8583 3456 (child protection) 020 8583 2222 (social services)
Islington	020 7527 7400	020 7226 0992
Kensington and Chelsea	020 7361 3013	020 7373 2227
Kingston	020 8547 5008	020 8770 5000
Merton	020 8545 4226 <i>or</i> , 4227	020 8770 5000
Richmond	020 8891 7969	020 8744 2442
Wandsworth	020 8871 6622	020 8871 6000
Westminster	020 7641 4000	020 7641 6000

The Local Safeguarding Children Board (LSCB)

The LSCB for Hammersmith & Fulham ensures the coordination of safeguarding work by all agencies and monitors the effectiveness of child protection work across the three local authority areas.

Further information can be found on the LBHF website:

www.lbhf.gov.uk/Directory/Health_and_Social_Care/Children_and_family_care/Local_Safeguarding_Children_Board/

If the Designated Safeguarding Lead or deputy designated staff or High Mistress are not available and there is a risk of immediate serious harm to a child **anyone** can report abuse or discuss concerns in relation to children and young people. The Family Services Front Door team for the London Borough of Hammersmith and Fulham can be contacted on 020 8753 6600 or familyservices@lbhf.gov.uk. Out of office hours the emergency duty team can be contacted on 020 8748 8588. For children living in other local authorities see below for contact numbers. In an immediate emergency dial 999 and report the matter to the police.

Contact details are as follows:

Role	Name	Telephone	Email
LSCB Manager	Emma Biskupski (interim)	020 8753 3914	hflscb@lbhf.gov.uk
LSCB Independent Chair	Jenny Pearce		

Other contact details:

The following telephone numbers may also be useful:

Organisation	Telephone
Childline	0800 1111
NSPCC	0808 800 5000
NSPCC Whistleblowing advice line	0800 028 0285
Ofsted's Whistleblower Hotline	0300 123 3155
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Child Exploitation Online Prevention (CEOP)	0870 000 3344
Samaritans	116 123

Complies with The Education (Independent School Standards) (England) Regulations 2014 and DfE guidance *Keeping Children Safe in Education* (September 2018) and *Working together to safeguard children* (July 2018)

Appendix 1 Reporting form

1. Introduction

- 1.1. This form comprises part of the School's safeguarding suite of documents and should be read in conjunction with the Safeguarding (child protection) policy, which is available on the School's website, the Staff Portal and in hard copy from the school office.

This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a pupil or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the School, for example on an educational visit.

Do not allow the completion of the form to delay notification of the concerns to the School's Designated Safeguarding Lead but pass the completed form to the Designated Safeguarding Lead, the High Mistress or Chairman of Governors as appropriate, as a matter of urgency.

- 1.2. The School's **Designated Safeguarding Lead** for child protection is Sandrine Paillasse (Deputy Head, Director of Pastoral Care). The Deputy Designated Safeguarding Leads are Helen Semple (Deputy Head, Director of People and Diversity) and Josephine Lane (Deputy Head, Director of Senior School)
- 1.3. The LADO for Hammersmith and Fulham is Megan Brown. **The contact number to be used is 020 8753 5125 or 0777667302**
- 1.4. **If for any reason you are not able to speak to the Designated Safeguarding Lead, the Deputy Designated Safeguarding Leads or the High Mistress, you should speak to your manager. If you are not able to follow this referral procedure and there is risk of immediate serious harm to a child you should contact Hammersmith and Fulham Family services Front Door team (020 8753 6600). If there is an immediate emergency, dial 999 and report the matter to the police.**

2. Data protection information notes

- 2.1 The School holds personal information about pupils in order to safeguard and promote their welfare, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure compliance with all relevant legal obligations.
- 2.2 The content of this form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 2018. Pupils, and in certain circumstances their parents, have the right to request access to personal information about them held by the School, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to pupils or parents.
- 2.3 The School will keep this record confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the High Mistress or the Designated Safeguarding Lead, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.

To be completed by a member of staff

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer
- listen carefully and keep an open mind
- do not take a decision as to whether or not the alleged abuse or neglect has taken place.

Reporting form – can be emailed, uploaded on CPOMS, or given as hard copy to the DSL

Please type or complete in black pen	
Date	
Time	
Place	
Member of staff present and position	
Full name of pupil(s)	
Ask the child to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form.	
A non-exhaustive list of the details to be included: <ul style="list-style-type: none">• what was said or done, by whom, to whom and in whose presence• when the incident took place and where• whether the child wishes their parents [or legal guardian] to be informed.	

Any additional comments or evidence

Details may include, for example, any concerns you may have about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of School.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

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Any suspicion or complaint of abuse must be reported to the Designated Safeguarding Lead (Sandrine Paillasse) or in her absence, the Deputy Designated members of staff (Helen Semple or Josephine Lane). If the complaint involves a member of staff or volunteer, it should be reported to the High Mistress.

DO NOT investigate the matter, as this could prejudice the investigations of outside agencies.

Where the concern or allegation is made against the High Mistress, you must immediately inform the Chairman of Governors or in their absence the Deputy Chairman of Governors without first notifying the High Mistress.

Where the concern or allegation is made against the Designated Safeguarding Lead, or the Deputy Designated Safeguarding Leads, you must immediately inform the High Mistress.

Please record what action you have taken and when

Full name of member of staff	
Signature	

Appendix 2 Allegations against staff

The School has procedures for dealing with allegations against staff, Governors 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 will be used where the member of staff or volunteer has:

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

Allegations against staff: Where an allegation or complaint is made against any member of staff, Governor, volunteer, or the Designated Safeguarding Lead, the matter should be reported immediately to the High Mistress. Where appropriate, the High Mistress will consult with the Designated Safeguarding Lead or Deputy Designated staff and all allegations will be discussed with the LADO **before** further action is taken. The LADO will be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or are made directly to the police. All discussions with the LADO should be recorded in writing.

Allegations against the High Mistress, Chairman of Governors or other Governor: Where an allegation or complaint is made against the High Mistress, the person receiving the allegation should immediately inform the Chairman of Governors, or in his absence the Deputy Chairman, without first notifying the High Mistress. The Chair of Governors, or in his absence the Deputy Chairman, will liaise with the LADO and relevant agencies as required. If an allegation is made against the Chairman of Governors or another Governor, the allegation should be reported to the High Mistress. In either case, any such allegations will be discussed with the LADO within one working day before further action is taken. The LADO will guide the school through the subsequent procedures.

Disclosure of information: The High Mistress will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. 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 High Mistress should 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. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. This information will be given in confidence and the School will consider its obligations under the Data Protection Act 1998.

Confidentiality: Section 13 of the Education Act 2011 prohibits the publication of any material to the public at large or any section of the public that may lead to the identification of a teacher accused of committing a criminal offence against a pupil at the school until such time as the accused person is charged with an offence. In all such cases the school will make every effort to maintain confidentiality in order to comply with these restrictions and will seek advice from the LADO, police and children's social care services as appropriate and parents will be informed of the requirement to maintain confidentiality.

Support: 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 should 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.

Action to be taken against the accused: 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 High Mistress (or the Chairman of Governors where the allegation is

against the High Mistress). The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to summary dismissal or a decision not to use the person's services in the future. If after the sharing of initial information, there is no further action to be taken, the LADO and the person in School managing the case should record the justification and consideration will then be given to what should be communicated to the staff member concerned and the person who made the initial allegation.

It may be necessary to undertake a further investigation to determine the appropriate action. If so, the LADO will discuss with the High Mistress 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 Hammersmith and Fulham Safeguarding Children Board.

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

- there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
- the allegation warrants investigation by the police; or
- the allegation is so serious that it might be grounds for dismissal.

If immediate suspension is considered, the High Mistress (or Chair of Governors) will always consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. The case will also be discussed with the LADO who will gather the views of children's social care and the police. The professional reputational damage that can arise from suspension where an allegation is later found to be unsubstantiated or malicious must be considered. It may be that the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment. In any event, the School will consider suspension on a case by case basis and after evaluating the risks.

If suspension is considered to be necessary, the rationale and justification will be recorded and the member of staff being suspended will be informed in writing within one working day. At the point of suspension, the member of staff will also be informed of who their point of contact within the school will be during the period of suspension and how they will be kept informed.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School, it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency's (TRA) (previously National College of Teaching and Leadership's (NCTL)) investigation.

Outcome of allegation investigations: In accordance with statutory guidance from the Department for Education, the following definitions will be used when determining the outcome of investigations:

Substantiated: there is sufficient identifiable evidence to prove the allegation

False: there is sufficient evidence to disprove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Criminal proceedings: 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.

Return to work: If it is decided that the person who has been suspended should return to work, the School should consider how to facilitate this, for example, a phased return may be appropriate and / or the provision of a mentor to provide assistance in the short term. The School should also consider how to manage the contact with the child[ren] who made the allegation.

Ceasing to use a person's services: If the School ceases to use the services of a member of staff or a person that had been engaged to work at the school (including temporary staff and those on fixed term contracts, staff employed via a contractor, or a Governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service within one month of the person leaving the school. Separate consideration will be given to whether a referral should be made to the National College for Teaching and Leadership in cases of professional misconduct involving teaching staff. 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.

Resignation: 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. Resignation or ceasing to provide services will not prevent a prompt and detailed report being made to the Disclosure and Barring Service in appropriate circumstances.

Timescales: 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 generally expected that 80% of cases of allegations of abuse against staff will be resolved within one month, 90% within three months, and all but exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the High Mistress should institute 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.

Unsubstantiated or malicious allegations: If an allegation by a pupil is determined to be unsubstantiated or malicious, the LADO will refer the child to children's social care services to determine whether the child is in need of support. Where an allegation by a pupil is shown to have been deliberately invented or malicious, the High Mistress will consider whether to take disciplinary action in accordance with the School's Behaviour policy.

Where a parent has made a deliberately invented or malicious allegation, the High 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.

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.

Record keeping: Details of an allegation including how the allegation was followed up and resolved and a record of any action taken and decision reached will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer. A copy will be provided to the person concerned. If the allegation was found to have been malicious all details will be removed from the employee's records.

References: Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have been found to be false, unsubstantiated or malicious should also not be included in any reference.

Appendix 3 Further information on the types and signs of abuse

Types of abuse and neglect (as defined in *Keeping Children Safe in Education* (September 2018))

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

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 is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or 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. serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section 12 of this policy).

Child sexual exploitation is a form of 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.

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.

Grooming: Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young

people don't understand that they have been groomed, or that what has happened is abuse.

'Institutional' grooming behaviour can be defined as follows (this is not an exhaustive list).

1. Target victims – sizes up vulnerability; identifies love/attention child seeks; assesses emotional neediness
2. Gains victim's trust – watches and gathers information; easily mixes with children and adults (caretakers; coaches; teachers); uses positional authority / proximity; may allow child to do something not permitted by parents to foster secrecy (sweets, staying up late on a trip, alcohol or drugs, viewing pornography); "you can tell me anything"; "I'll tell you a secret if you tell me one"; "If anyone was to find out that would be the end of us..."
3. Gaining trust of others – normal / nice guy; be a great teacher; go the extra mile; quick conversation with adults about lies / misdeeds of child to sow trust / mistrust
4. Filling a need: becoming more important to child; gifts; special attention; favouritism; special trips / activities
5. Isolating the child: wedge between child and caregivers; loved or appreciated in a way not even the parents could provide (could be a positive male / female role model); parents may reinforce this by their own appreciation of the relationship
6. Sexualising the relationship: desensitising – tickling; playful touches; hugs; talking as if adults (about marital problems, conflict etc.)' adult jokes and innuendo; swimming (skinny-dipping)
7. Maintaining control – secrecy and blame – child may feel costs of losing material needs or emotional consequences of exposing; keeps pushing – child may signify they are uncomfortable; offender says they are profoundly sorry and gains more access.

Signs of abuse

The information given here has been taken from the NSPCC Child Protection factsheet. The guidance notes are not meant to be exhaustive and staff should not jump to conclusions because of the presence of just one of the factors below. Every case is different.

Physical abuse	
<p>The physical signs of abuse may include:</p> <ul style="list-style-type: none"> • unexplained bruising, marks or injuries on any part of the body or injuries which the child can't explain • multiple bruises - often on the upper arm or outside the thigh • cigarette burns • human bite marks • broken bones • scalds especially those with upward splash marks suggesting that hot water has been thrown over the child • multiple burns with a clearly demarcated edge 	<p>Changes in behaviour that can also indicate physical abuse may include:</p> <ul style="list-style-type: none"> • fear of parents being contacted for an explanation • aggressive behaviour or severe temper outbursts • flinching when approached or touched • reluctance to get changed, even, for example, in hot weather or for sporting events • withdrawn behaviour • running away from home
Emotional abuse	
	<p>Changes in behaviour that can indicate emotional abuse may include:</p> <ul style="list-style-type: none"> • neurotic behaviour eg sulking, rocking • being unable to play • fear of making mistakes

¹ Definition of institutional behaviour: **Institutions** are "stable, valued, recurring patterns of **behaviour**". As structures or mechanisms of social order, they govern the **behaviour** of a set of individuals within a given community.

	<ul style="list-style-type: none"> • sudden speech disorders • self-harm • fear of parent being approached regarding behaviour • developmental delay in terms of emotional progress • extremist views
Sexual abuse	
<p>The physical signs of sexual abuse may include:</p> <ul style="list-style-type: none"> • pain or itching in the genital area • bruising or bleeding near genital area • sexually transmitted disease • vaginal discharge or infection • stomach pains • discomfort when walking or sitting down • pregnancy 	<p>Changes in behaviour that can also indicate sexual abuse may include:</p> <ul style="list-style-type: none"> • sudden or unexplained changes in behaviour, eg becoming aggressive or withdrawn • fear of being left with a specific person or group of people • having nightmares • running away from home • sexual knowledge which is beyond their age or developmental level • sexual drawings or language • bedwetting • eating problems such as overeating or anorexia • self- harm • saying they have secrets which can't be told to anyone • substance misuse • not being allowed to have friends (particularly in adolescence) • acting in a sexually explicit way towards adults
Neglect	
<p>The physical signs of neglect may include:</p> <ul style="list-style-type: none"> • constant hunger, sometimes stealing food from others • constantly dirty or 'smelly' • loss of weight, or being constantly underweight • inappropriate clothing for the weather conditions 	<p>Changes in behaviour that can also indicate neglect may include:</p> <ul style="list-style-type: none"> • complaining of being tired all the time • not requesting medical assistance and/or failing to attend appointments • having few friends • mentioning being left alone or unsupervised
Child sexual exploitation	
<p>The physical signs of neglect may include:</p> <ul style="list-style-type: none"> • sexually transmitted infections or pregnancy 	<p>Changes in behaviour that can also indicate neglect may include:</p> <ul style="list-style-type: none"> • unexplained gifts or new possessions • associating with other young people involved in exploitation • having older boyfriends or girlfriends • changes in emotional well-being • misuse of drugs and alcohol • missing for periods of time or regularly coming home late • regularly missing school or education or not

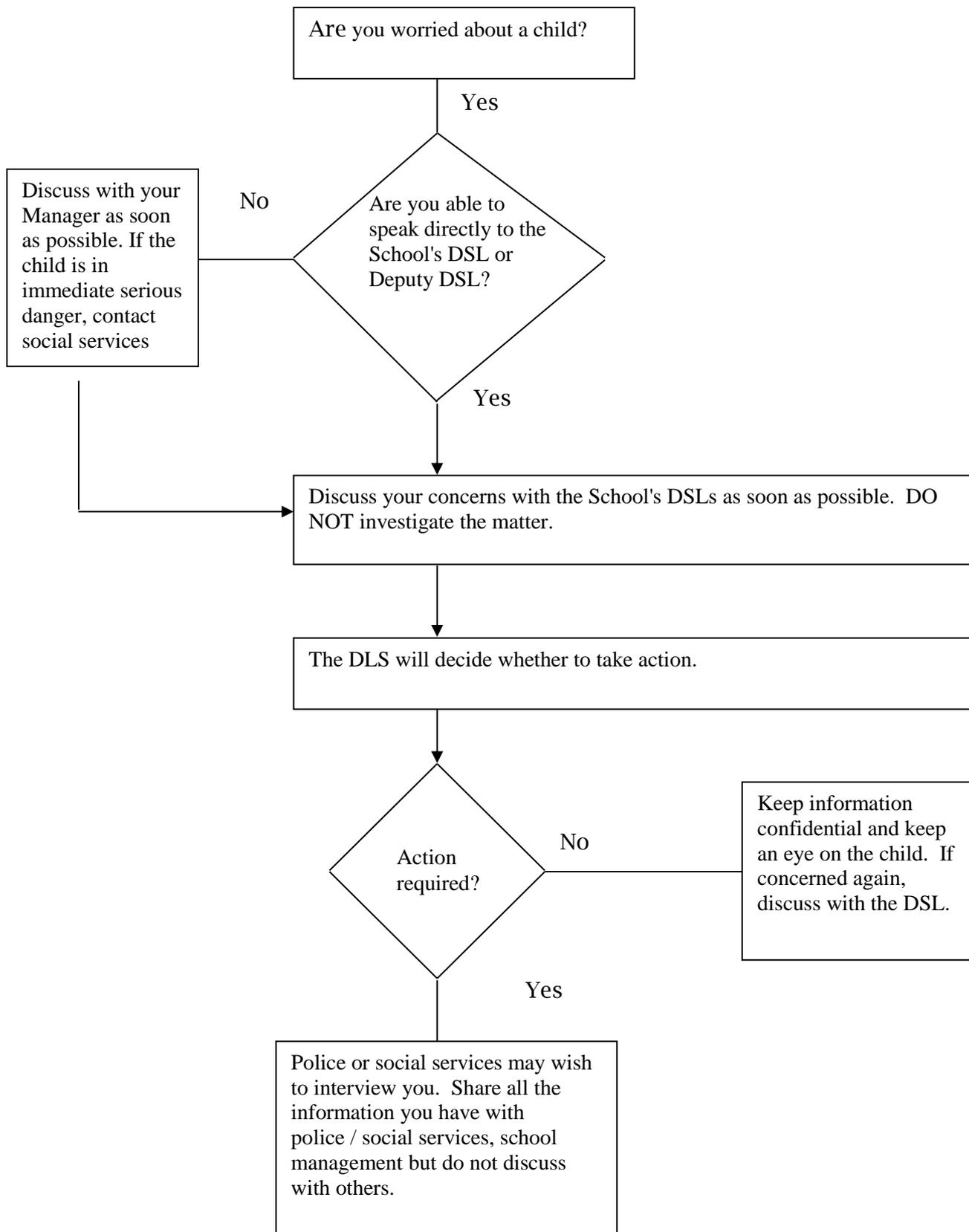
	taking part in education.
Grooming	
<p>The physical signs of grooming may include:</p> <ul style="list-style-type: none"> • <i>see sexual abuse</i> 	<p>Changes in behaviour that can also indicate grooming may include:</p> <ul style="list-style-type: none"> • wanting to spend more and more time online • being secretive about who they are talking to online and what sites they visit • possessing items (such as electronic devices or phones) that parents have not provided • being emotionally volatile • having older boyfriends or girlfriends • going to unusual places to meet friends • having access to drugs and alcohol.
FGM	
<p>The physical signs of FGM may include:</p> <ul style="list-style-type: none"> • difficulty walking, sitting or standing • severe pain • bleeding • shock • inability to urinate • infections such as tetanus, HIV and hepatitis B and C 	<p>Changes in behaviour that can also indicate FGM may include:</p> <ul style="list-style-type: none"> • spending longer than normal in the bathroom • unusual behaviour after an absence from school • particularly reluctant to undergo normal medical examinations • asking for help, but may not be explicit about the problem due to embarrassment or fear

Further guidance and practical support on specific safeguarding issues are available on the NSPCC website www.nspcc.org.uk. Guidance and advice is also available in the DfE's *What to do if you're worried a child is being abused* (March 2015)

Broad government guidance on the following is also available via the GOV.UK website (see Part one *Keeping Children Safe in Education* (September 2018))

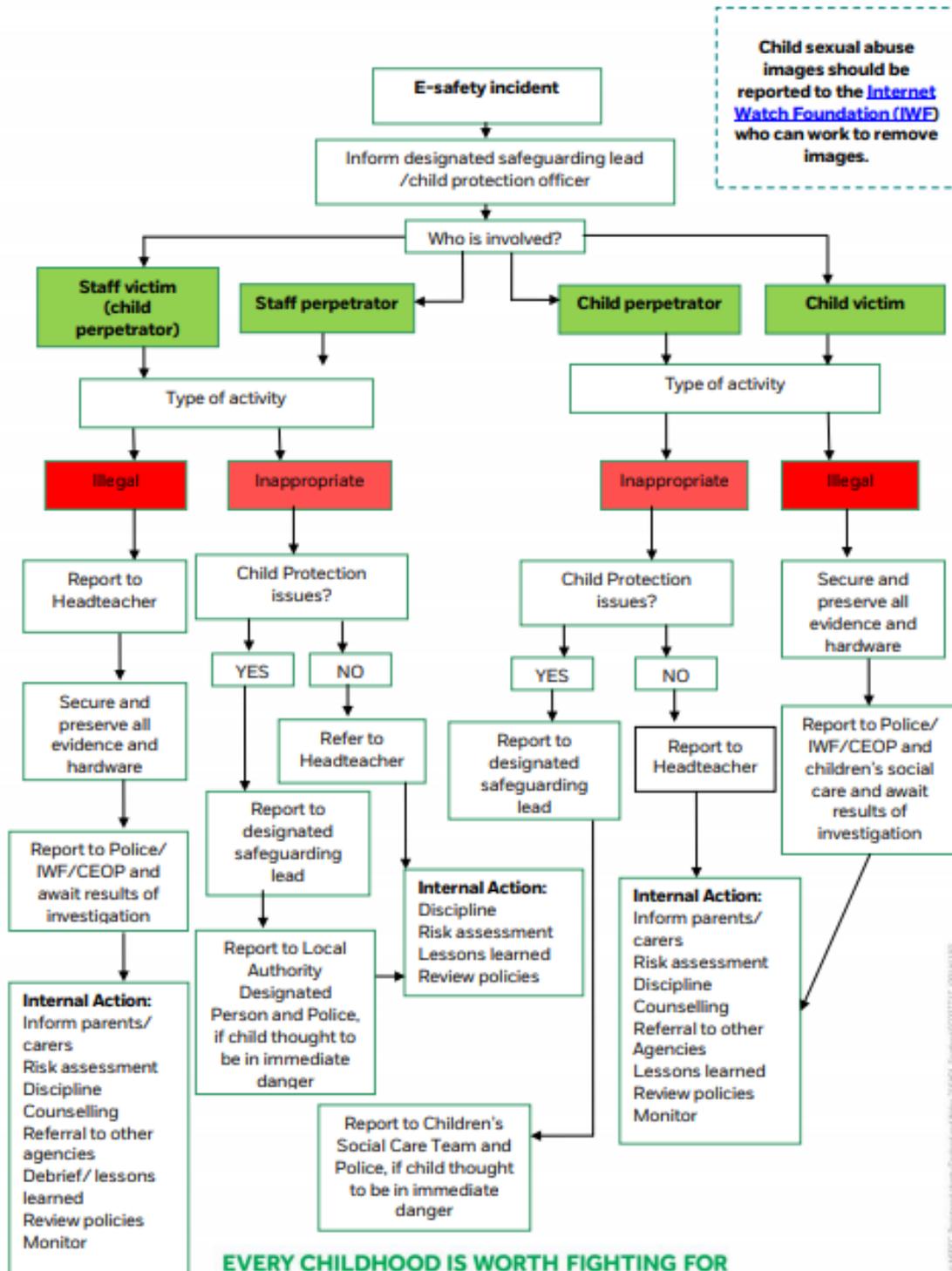
- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults strategy
- Private fostering
- Preventing radicalisation
- Sexting
- Relationship abuse
- Trafficking

Appendix 4 Flowchart for a member of staff worried about a pupil.

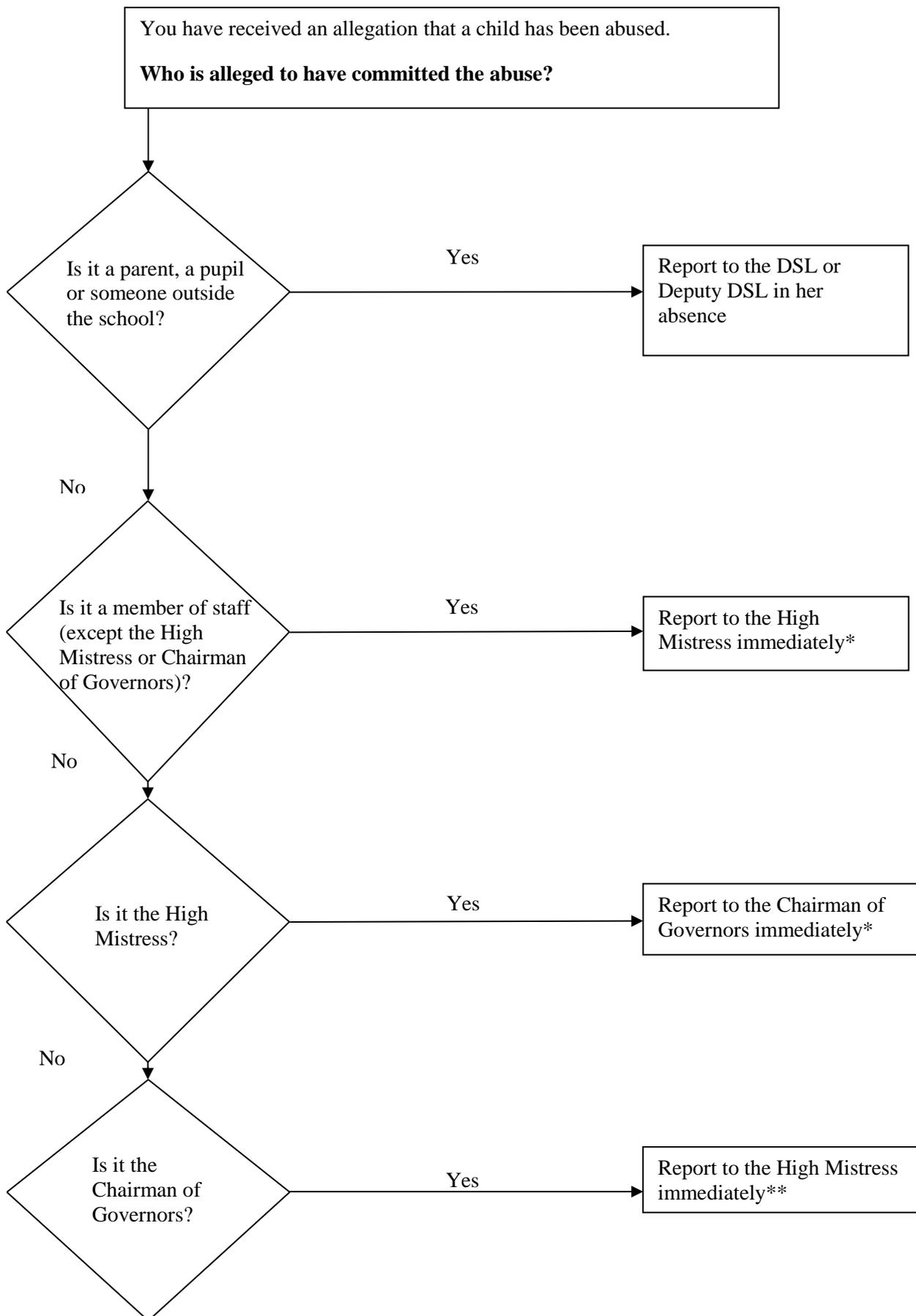




What to do if a pupil or a teacher reports an e-safety incident



Appendix 6 Allegations flowchart.



* The LADO must be contacted.