

Safeguarding (child protection) policy

Action	Policy to be reviewed as required and at least annually		
	Owner	Date	Completed
Review	Director of Senior School	August 2020	✓
Review	Education Committee	8 October 2020	✓
Approved	Board of Governors	8 December 2020	✓

Updated in April 2021 to include NSPCC helpline

To be published on the following:	
Staff Portal	✓
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 published on the School website and hard copies are available to parents on request. This policy can be made available in large print or other accessible format if required. It applies wherever staff or volunteers are working with students 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 2020) as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action in the best interests of the child to ensure the best outcomes.
- 1.3. Every student 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, 6.1 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 not 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).
- 1.5. The effects of the Covid-19 pandemic will be felt in varied ways across the School community. The effects include (and are not limited to): absence from the School site; lack of contact with friends, family and community members; inability to sit exams; illness of friends and/or family; bereavement; isolation; complexities and challenges within the domestic sphere; technological overload and so on. The manifestation of these may include (and are not limited to): low mood, depression, anxiety, mental health needs; withdrawal, loneliness, first or second-hand trauma. All staff must be mindful that all students will require significant pastoral support and care as a consequence of the pandemic.

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, volunteers and supply staff to share this commitment. We recognise that children have a fundamental right to be protected from harm and that students 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 students' 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 2020) and the Education (Independent School Standards) (England) Regulations 2014. Procedures are outlined in the School's Staff Safer **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 2020)
- 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. The School understands that there is a legal duty to refer and a failure to refer when criteria are met is a criminal offence. 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 students 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 Local Safeguarding Children Partnership (LSCP) (or other LSCP 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 student from any form of abuse, whether from an adult or another student 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 students 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

- give due consideration to when to call the Police, using the NPCC guidance – [NPCC Guidance – When to Call the Police](#)
- 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 students 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 Initial Contact and Advice** 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:**

- act as a point of contact with the three safeguarding partners
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and the SMT. Their role should include ensuring that all staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children
- to be the first point of contact for parents, students, 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
- overarching responsibility for promoting online safety
- 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 student records.
- to ensure that notification of further record keeping is marked on the student 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 students 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 multi-agency procedures put in place by the LSCP (Local Safeguarding Children Partnership) 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 student's new school (and that it is sent separately from the main student 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.

If they have a concern during the holidays, staff should contact the school, who in turn will contact the DSL or DDSL.

<p>4.6. The Designated Safeguarding Lead for the School site is Lizzie Beesley (Deputy Head, Director of Pastoral Care who may be contacted on 020 7605 4892.</p>
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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 Simon Wathen, Chair of Governors or in his absence, Ms Zeina Bain, the Deputy Chair of Governors, without notifying the High Mistress first; and
- liaise with social services and other agencies on behalf of the School.

<p>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</p>
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Head, Director of People and Diversity) who may be contacted on 020 7605 1118, **Jophy Lane** (Deputy Head, Director of Senior School) who may be contacted on 020 7605 4817, **Giles Bennett** (Head of Lower School) who may be contacted on 020 7605 4803 and **Kaarin Scanlon** (Head of Middle School) who may be contacted on 020 7605 4859.

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 maltreatment 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 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, 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 online). 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 6 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. Neglect can 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.

Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

6. Safeguarding issues

6.1. Peer on peer abuse

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);
- Physical abuse;
- Sexual abuse;
- Sexual violence and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress or alarm. The Voyeurism (Offences) Act, also known as the Upskirting Act came into effect in 2019. Upskirting is a criminal offence and anyone of any gender can be a victim;
- Sexting
- Initiation / hazing type violence and rituals.

All peer on peer abuse is unacceptable and will be taken seriously. Staff must be aware that children may be abused out of school, but should not minimise the potential risks of girl on girl abuse.

6.2. Gangs and serious youth violence

A gang is defined as a group of young people who spend time together, often fighting other groups or involved in anti-social behaviour. Youth violence refers to harmful behaviours that can start early and continue into adulthood. The young person can be a victim, an offender, or witness the violence. Youth violence includes various behaviours including some violent acts such as bullying, slapping or hitting. These behaviours can cause more emotional harm than physical harm. Others, such as robbery and assault (with or without weapons) can lead to serious injury or even death.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

6.3. 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 under the age of 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 p83 of Keeping Children Safe in Education *Annex A* (September 2020).

6.4. Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school. All staff, but

especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. The school needs to provide as much information as possible as part of the referral process to children's social services. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

6.5. 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.

6.6. We recognise that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff must understand that these children's experiences can impact on their mental health, behaviour and education.

6.7. Young people may need a social worker due to safeguarding or welfare needs. Young people on CIN or CP plans will have an allocated social worker. The school recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact that a young person has a social worker, and the DSL will use this information to ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. The allocation of a social worker to a young person should inform decisions about safeguarding, for example responding to unauthorised absence or missing education here there are known safeguarding risks, and about promoting welfare, for example allocating pastoral and/or academic support.

6.8. All staff must understand that mental health issues can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. It is important that all staff recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. All staff, however, are well placed to observe young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health issue or be at risk of developing one.

Further guidance is given at Appendix 2

7. Signs of abuse

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

- the student says she has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a student'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 student'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 student's behaviour. For example, they may become aggressive, challenging, disruptive, withdrawn or clingy
- the student does not want to change clothes in front of others or participate in physical activities
- the student is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- the student talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the student has poor school attendance or punctuality
- the student is regularly missing from school or education
- the student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
- the student's development is delayed in terms of emotional progress
- the student suddenly loses or gains weight
- the student drinks alcohol regularly from an early age
- the student is concerned for younger siblings without explaining why
- the student talks about running away
- the student shies away from being touched or flinches at sudden movements
- the student demonstrates undue anxiety, over-reacts to problems and demonstrates an excessive fear of making mistakes
- the student appears neglected, e.g. dirty, hungry, inadequately clothed; poor hygiene
- the student 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.

7.2. 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 2. 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).

8. Procedures to minimise the risk of peer on peer abuse

8.1. Staff training

Staff should always be clear that abuse is abuse and should never be tolerated or passed off as "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.

Form tutors discuss pastoral cases at least termly, some of which may relate to peer on peer abuse.

8.2. Education

Upon joining the school, new MIV students go through an induction process, during which they read and discuss the antibullying and behaviour policies. Students joining the school during the academic year are given copies of these policies and are expected to read them.

The pastoral curriculum (form time, PSHE, year assemblies) provides opportunities to teach children about appropriate and safe relationships. Topics include relational aggression, kindness, bullying, friendships, healthy relationships, radicalisation and grooming. There are other opportunities for discussion throughout the academic year (wellbeing week; PSHE Week; form captain meetings; PSHE ambassador meetings; School Council; Diversity group meetings).

8.3. Supervision

Staff are on patrol duty during break and lunchtime to minimise the risk of adult-free zones. CCTV is in operation in designated areas of the school and footage may be accessed as part of an investigation. The pastoral team and Estates team regularly liaise when a need arises to make an area of the school more accessible and visible.

9. Preventing Radicalisation

9.1. 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. This includes calling for the death of members of the armed forces. Terrorism is an action that endangers or causes serious violence to a person/people; it 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.

9.2. All staff are subject to the Prevent duty: they must have due regard to the need to prevent people from being drawn into terrorism.

9.3. **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.

- 9.4. **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.
- 9.5. **Working in partnership:** The Designated Safeguarding Lead will continue existing partnership arrangements and keep open lines of communication with the Local Safeguarding Children's Partnership.
- 9.6. **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 training.
- 9.7. **IT:** Suitable filtering is reviewed to keep students safe from terrorist and extremist material when accessing the internet in school.
- 9.8. **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 PSHE programme for students.
- 9.9. **Procedures:** If a member of staff is concerned that a student 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

10. Online Safety

- 10.1. 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:
 - 10.1.1. Content: being exposed to illegal, inappropriate or harmful material;
 - 10.1.2. Contact: being subjected to harmful online interaction with other users; and
 - 10.1.3. Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- 10.2. 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 students' age range, their frequency of access and the proportionality of costs vs risks.

11. Responsibility of all staff, governors and volunteers

11.1. 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 students and to be able to identify students 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.

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 Staff Acceptable Use policy the Anti-bullying policy and the Student Acceptable Use policy.

11.2. **Training:** All staff will undertake appropriate training including refresher training in accordance with advice provided by the Local Safeguarding Children Partnership (LSCP) 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 staff are trained to manage a report of child on child sexual violence and sexual harassment.

All new staff, including temporary staff and volunteers are provided with induction training that includes safeguarding and Prevent training, this policy (which contains how to contact the Designated Safeguarding Lead), the Staff Code of Conduct, the Staff Acceptable Use policy, the Whistleblowing policy, the identity of the Designated Safeguarding Lead and her Deputies and a copy of Part 1 and Annex A of the DfE's *Keeping Children Safe in Education* (September 2020). All staff are required to read Part 1 and Annex A of this guidance each time it is updated. SMT and the online-safety coordinator are responsible for reading Annex C (Online Safety) of this guidance.

11.3. 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 are taught about online safeguarding.

11.4. **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 students 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.

12. What staff should do if they have concerns about a child or receive a complaint of abuse:

Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

12.1. **Concerns / initial complaint of abuse:** Staff should act on their concerns immediately and

- **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. The record can be entered directly on CPOMS. **For urgent concerns, the member of staff should seek the DSL or a deputy in person immediately.**
- 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 with other colleagues

12.2. **Sexting:**

There is no clear definition of 'sexting'. The UKCCIS guidance uses the terminology 'youth produced sexual imagery'. This is imagery that is being created by under-18s themselves and involves still photographs, video and / or streaming. In the guidance, this content is described as sexual and not indecent. The term 'indecent' is subjective and has no specific definition in UK law.

Incidents covered by the guidance:

- A person under 18 creates a sexual image of themselves and shares it with another person under 18.
- A person under 18 shares an image of another under-18 with another person under 18 or an adult.
- A person under 18 is in possession of sexual imagery created by another person under 18.

Incidents not covered by the guidance:

- Under-18s sharing adult pornography.
- Under-18s sharing sexual texts without sexual imagery.
- Adults sharing sexual imagery of under-18s. (This is child sexual abuse and must always be reported to police.)

Guidance from: UKCCIS Sexting in Schools and Colleges: Responding to Incidents and Safeguarding Young People, 2016

The response should be guided by the 'principle of proportionality'. 'The primary concern at all times should be the welfare and protection of the young people involved.' (UKCCIS Sexting in schools and colleges: responding to incidents and safeguarding young people, p.8).

The Law

Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you are under 18. 'Indecent' is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. Young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue." Schools may respond to incidents without involving the police. (However, in some circumstances, the police must always be involved.)

Crime recording

When the police are notified about youth-produced sexual imagery, they must record this as a crime. The incident is listed as a crime, and the young person is the suspect. This is, however, not the same as a criminal record. Every crime reported to the police must have an outcome code. The NPCC, Home Office and the Disclosure and Barring Service (DBS) have agreed a new outcome code for youth-produced sexual imagery: *Outcome 21*. This outcome code allows the police discretion not to take further action if it is not in the public interest, even though there is enough evidence to prosecute. Using this outcome code is likely, although not impossible, to mean the offence would not appear on a future Enhanced DBS check, as that disclosure is a risk-based decision. Schools can be assured that the police have the discretion they need not to adversely impact young people in the future.

Handling incidents

- Refer to the Designated Safeguarding Lead (DSL)
- The DSL will meet with the young person / people involved
- Do not view the image unless it is unavoidable (see Viewing Images below)
- Confiscate the device, switch off the device and place the device in a sealed (and signed and dated) envelope
- If there is any concern the young person is at risk of harm, social care or the police should be contacted

Always refer to the police or social care if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent (e.g. if the young person has SEN)
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

Once a DSL has enough information, the decision should be made to deal with the matter in school or to refer it to the police or to social care. All information and decision-making

should be recorded in line with school policy. If the incident has been dealt with in school, a further review should be held to assess risks.

Assessing the risks once the images have been shared

When assessing the risks (to the young person) when an image has been shared, the following points should be considered:

- Has it been shared with the knowledge of the young person?
- Are adults involved in the sharing?
- Was there pressure to make the image?
- What is the impact on those involved?
- Does the child or children have additional vulnerabilities?
- Has the child taken part in producing sexual imagery before?

Viewing images

- Avoid viewing youth-produced sexual imagery. Instead, respond to what you have been told the image contains.
- If such imagery is viewed, discuss with the Designated Safeguarding Lead immediately.
- Never copy, print, or share the image (it is illegal to do so).
- View the image with another member of staff present.
- Record the fact that the images were viewed, along with reasons for doing so and who was present. Sign and date this record.

12.3. **Preserving evidence:** All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved and given to the designated safeguarding lead.

Deleting images (from devices and social media)

If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images. It is recommended that students are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated. Any refusal to delete the images should be treated seriously, reminding the student that possession is unlawful.

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 14 and Appendix 1.

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 Initial Contact and Action team or the social services department where the child lives (see section 20 for contact numbers). Anybody can make a referral. If there is an immediate emergency, dial 999 and report the matter to the police.

12.4. Members of staff are asked to use the following guidance when logging a disclosure or concern:

Information to include:

- Date
- Time
- Place

- Member of staff present and position
- Full name of student(s)

The member of staff should ask the child to explain their concern or allegation and record details of the matter, including:

- 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 guardians) to be informed
- Details may also include any concerns about signs of physical abuse, emotional abuse, sexual abuse or neglect from outside of school.
- Details of the action taken by the member of staff

The member of staff should ask open questions and not leading questions; listen carefully and keep an open mind; not take a decision as to whether or not the alleged abuse or neglect has taken place. Any other evidence, such as written notes, items of clothing or mobile phone messages should be given to the DSL.

The record should be uploaded on CPOMS or given to the DSL in person. In an emergency, the DSL or a DDSL must always be phoned immediately.

12.5 Data protection information

12.5.1 The School holds personal information about students 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.

12.5.2 This information is subject to the provisions of the Data Protection Act 2018 and the GDPR. Students, and in certain circumstances their parents, have the right to request access to personal information about them held by the School, although exemptions may apply depending on the circumstances. Advice may need to be sought (for example from legal advisers and welfare agencies) before any information of this nature is disclosed to students or parents.

12.5.3 The School will keep safeguarding information confidential and share it on a need to know basis, disclosing only to those who need the information in order to safeguard and promote the welfare of children. This includes allowing practitioners to share information without consent when there is good reason to do so and the sharing of that information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or to gain consent would place a young person at risk. A young person's personal data may be withheld where the serious harm test under the legislation is met. The information may be shared outside the school for example, where, in the professional opinion of the High Mistress or the Designated Safeguarding Lead, it is deemed necessary to share information with the social services or the police for the purpose of child protection investigations. Further information is available in the School's Privacy Notice.

12.5.4 The DfE has provided a Data Protection toolkit for Schools – [Data Protection: a toolkit for schools.](#)

12.6 Action by the Designated Safeguarding Lead on receiving a notification of concern / complaint of abuse.

Options may include: managing any support for the child internally via the school's own pastoral support processes; an early help assessment; or a referral for statutory services.

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 student who has complained, provided that the student 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 student's wishes
- Consider the wishes of the complainant's parents, provided they have no interest which is in conflict with the student'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.

12.7 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 and / or the police 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 Initial Contact and Advice 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 (e.g. early help or pastoral 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 liaise with the LSCP as needed.
- 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.
- Anybody can make a referral. Parental consent is not required for referral to statutory agencies.

12.8 **Multi-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 multi-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 LSCP (or other LSCPs as may be appropriate) so that it can perform its function as required under the Children Act 2004.

13 Mandatory notification of questionable / defined conduct

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

13.1.1 of any conduct that they suspect may be inappropriate (whether in isolation, or as part of a pattern);

13.1.2 this general duty will include certain defined conduct, such as:

- 13.1.2.1 unsupervised access to a child in changing, sleeping in non-public accommodation at the school or on school trips;
- 13.1.2.2 the use of sexually inappropriate language, references or jokes; and
- 13.1.2.3 and other private communication outside of the school's defined social and social media policies.

14 Allegations against staff

14.1 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 1) follow part four of *Keeping Children Safe in Education* (September 2020) 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
- or behaved or may have behaved in a way that indicates that he or she may not be suitable to work with children.

14.2 **Staff guidance:** Guidance is given to staff to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student. Staff should be particularly careful in situations where they are alone with students 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.

14.3 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. The LADO will be contacted within one working day of an allegation made to the High Mistress. The school will not investigate before a referral is made to the LADO.

15 Allegations against students (serious violence and peer on peer abuse)

15.1 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 students 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 student(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.

15.2 A student 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 Initial Contact and Action team on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the student or students accused of abuse.

15.3 If it is necessary for a student 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 Initial Contact and Action team, parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. In the case of students whose parents are abroad, the student's guardian will be requested to provide support to the student.

15.4 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 services have been involved then support may be provided through the Early Help or wider safeguarding team.

15.1 The PSHE programme provides opportunities to teach students about online safety, bullying and peer relationships. Students should be just as clear about what is expected of them online as offline.

15.2 Student 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.

16 Informing parents

16.1 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.

17 Confidentiality and information sharing

17.1 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.

17.2 Student 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 student 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 student file) to a designated contact at the new school and confirmation of safe receipt obtained.

17.3 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. If the member of staff is dismissed as a result of an allegation, the school will inform the Disclosure and Barring Service. If professional misconduct is confirmed, the Teaching Regulation Agency will be informed.

18 Other safeguarding arrangements

18.1 Beyond the child protection procedures outlined in this policy, the School has put in place arrangements to safeguard students and to promote their welfare. These include the following:

18.2 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.

18.3 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 2020) as outlined in the Educational Visits Policy. The School reserves the right to exclude a student from a visit on medical/mental health and wellbeing grounds.

18.4 Listening to students: The School provides a range of opportunities for students to be listened to. Tutor groups throughout the School are small (typically 13-15 students) 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.

18.5 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), one counsellor (covering two days) and a wellbeing coach (two days a week). The school also provides placement opportunities to trainee counsellors. There is currently one trainee supporting staff and senior school students. Students may self-refer to the nurse, doctor or any of the counsellors or coach. Parental permission is sought for referrals to external CAMHS services.

18.6 Teaching students about safeguarding: Students are taught about a range of safeguarding issues (including online safety, substance misuse, child sexual exploitation, grooming, mental health, self-harm and bullying, relationship education, relationships and sex education and health education) through their tutorial sessions, in PSHE lessons and by visiting speakers. Students 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 (RSE). Resilience to

radicalisation is taught through PSHE by promoting fundamental values and enabling students to challenge extremist views.

18.7 Suitable filtering and monitoring is in place to protect students from online abuse.

18.8 Missing students: A child going missing from education is a potential indicator of abuse. Students are registered in accordance with DfE requirements and the school has procedures in place to deal with students that go missing either from school or on a school trip. These procedures are outlined in the Missing Student policy.

18.9 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 students. 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). Students who are at risk of harm are either referred to external agencies in accordance with these procedures and/or if the student is at risk of harm from herself, the Designated Safeguarding Lead will assess the risk and may put in place a care plan that may be shared with relevant teachers.

18.10 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.

18.11 School premises: The School takes all practicable steps to ensure that School premises are as secure as circumstances permit.

18.12 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
- Student Acceptable Use
- Learning Support
- Missing Student
- Mental Health and Wellbeing
- Substance Misuse Management and Education
- Student Search and Confiscation
- Online safety
- Staff Safer Recruitment and Selection (available on staff portal and the school website)
- Staff Code of Conduct (available on staff portal or on request from the school office)
- Staff Acceptable Use Policy
- Volunteer management (available on staff portal or school website)
- Visitors' 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)

19 Monitoring and review

19.1 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.

19.2 In addition, the Designated Safeguarding Lead will monitor the operation of this policy and its procedures.

19.3 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.

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

20 Key Contacts

Role	Name	Telephone	Email
Designated Safeguarding Lead	Lizzie Beesley (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	Jophy Lane (Director of Senior School)	020 7605 4817	jl@spgs.org
Deputy Designated Safeguarding Lead	Giles Bennett (Head of Lower School)	020 7605 4803	Giles.bennett@spgs.org
Deputy Designated Safeguarding Lead	Kaarin Scanlon (Head of Middle School)	020 7605 4859	Kaarin.Scanlan@spgs.org
High Mistress	Sarah Fletcher	020 7605 4801	hmpa@spgs.org
Chair of Governors	Simon Wathen	simon.wathen@spgs.org	
Governor with responsibility for Safeguarding	Geeta Khehar	Geeta.khehar@spgs.org	
Deputy Chair of Governors	Zeina Bain	Zeina.Bain@spgs.org	

		<p>You may also contact the Secretary to the Governors, Mrs Nicki Goodfellow:</p> <p>St Paul's Girls' School, Brook Green, London, W6 7BS</p> <p>Telephone: 0207 605 1125 or out of hours: 07946 116130</p> <p>Nicki.goodfellow@spgs.org</p>
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Local safeguarding partnership arrangements

Multi-agency arrangements for safeguarding children is led by the three Safeguarding Partner agencies:

- the local authority
- clinical commissioning group
- the police

The Safeguarding Partners have come together to form the Local Safeguarding Children Partnership, replacing the Local Safeguarding Children Board.

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

Role	Name	Telephone	Email
Hammersmith and Fulham Initial Contact and Advice Team		020 8753 5125 020 8753 6610 / 6600 Out of hours: 020 8748 8588	
Hammersmith and Fulham Family Services Duty Line (works with the Initial Contact and Advice Team)		0208 753 6600	familyservices@lbhf.gov.uk
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 07776 673 020	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)	Karen Duncan	020 7641 3991	kduncan1@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 6918 07467 734 648	emily.harcombe@lbhf.gov.uk
FGM advice	Rochelle-Ann Naidoo	020 7641 7564	rnaidoo@westminster.gov.uk

Prevent/counter-extremism contacts

Prevent Manager (Education and Projects)	Tina Bencik	020 8753 2992 07977470316	tina.bencik@lbhf.gov.uk
Local Team		020 8753 5727	prevent@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 or, 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) - transition to new multi-agency safeguarding arrangements

The Local Safeguarding Partners (Hammersmith & Fulham Council, Central West Basic Command Unity (Police) and the Clinical Commissioning Group) **became** fully operational in 29 September 2019, and will take forward the work of the Local Safeguarding Children Board to promote the welfare of children in the local area.

Further information can be found on these websites:

<https://www.rbkc.gov.uk/lscb/about-us>
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 Initial Contact and Action team for the London Borough of Hammersmith and Fulham can be contacted on 020 8753 6610; the Hammersmith and Fulham Family Services team can be contacted on 020 8753 6600 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
LSCP Manager	Emma Biskupski (interim)	020 8753 3914	hflscb@lbhf.gov.uk
LSCP Independent Scrutineer	Jenny Pearce		

Other contact details:

The following telephone numbers may also be useful:

Organisation	Telephone
Childline	0800 1111

NSPCC NSPCC Whistleblowing advice line	0808 800 5000 0800 028 0285 help@nspcc.org.uk
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

A new NSPCC helpline, Report Abuse in Education, was launched on 1 April 2021 as a response to the Everyone's Invited movement. The DfE commissioned this new initiative and the helpline is intended to provide appropriate support and advice to victims of abuse and harassment, and concerned adults, including onward action such as contacting the police if they wish to.

This dedicated helpline will offer support to:

- all children and young people making current and non-recent disclosures of sexual harassment or abuse on school grounds within school time, and incidents linked to school in any capacity
- any children or young people who want to talk about being involved or witnessing any incidents
- any adults who have experienced non-recent abuse
- parents and carers who have any concerns about their own or other children
- professionals who work in schools and need support in this or related issues.

Anyone who gets in touch through this dedicated helpline will also be signposted to other relevant support services available, including Childline - which provides ongoing support and counselling to children and young people.

The Report Abuse in Education helpline comes after a high number of anonymous testimonials were submitted to the Everyone's Invited website, documenting abuse in all types of schools, colleges, and universities.

Young people and adults can contact the NSPCC helpline, Report Abuse in Education on [0800 136 663](tel:0800136663) or email help@nspcc.org.uk

Complies with The Education (Independent School Standards) (England) Regulations 2014 and DfE guidance <i>Keeping Children Safe in Education</i> (September 2020) and <i>Working together to safeguard children</i> (July 2018)

Appendix 1 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;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates that he or she may not be suitable to work with 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. The school will not investigate before a referral is made to the LADO. An allegation made against a supply teacher should also be reported to the LADO. The employment agency should be informed and be fully involved and cooperate with the LADO, Police and/or children's services as required. The School will lead on the case. **Allegations against the High Mistress, Chair 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 Chair of Governors, or in his absence the Deputy Chair, without first notifying the High Mistress. 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. 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 student 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 Chair 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 Partnership.

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 student 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 student 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 student 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 2 Further information on the types and signs of abuse

Types of abuse and neglect (as defined in *Keeping Children Safe in Education* (September 2020))

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 6 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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.

Child Criminal Exploitation (CCE): Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence and weapons to ensure compliance of victims. Young people are often recruited to move drugs and money between locations and are known to be exposed to techniques, such as 'plugging', where drugs are concealed internally to avoid detection. Young people can easily become trapped in this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines networks. CCE can also include young people being forced to work in cannabis factories, being forced to shoplift, or to threaten other young people.

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'¹ 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.

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.

Physical abuse

- The physical signs of abuse may include:**
- 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

- Changes in behaviour that can also indicate physical abuse may include:**
- 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

- Changes in behaviour that can indicate emotional abuse may include:**
- neurotic behaviour eg sulking, rocking
 - being unable to play
 - fear of making mistakes
 - sudden speech disorders
 - self-harm
 - fear of parent being approached regarding behaviour
 - developmental delay in terms of emotional progress
 - extremist views

Sexual abuse

- The physical signs of sexual abuse may include:**
- pain or itching in the genital area
 - bruising or bleeding near genital area
 - sexually transmitted disease
 - vaginal discharge or infection
 - stomach pains
 - discomfort when walking or sitting down
 - pregnancy

- Changes in behaviour that can also indicate sexual abuse may include:**
- 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
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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.
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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.
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FGM

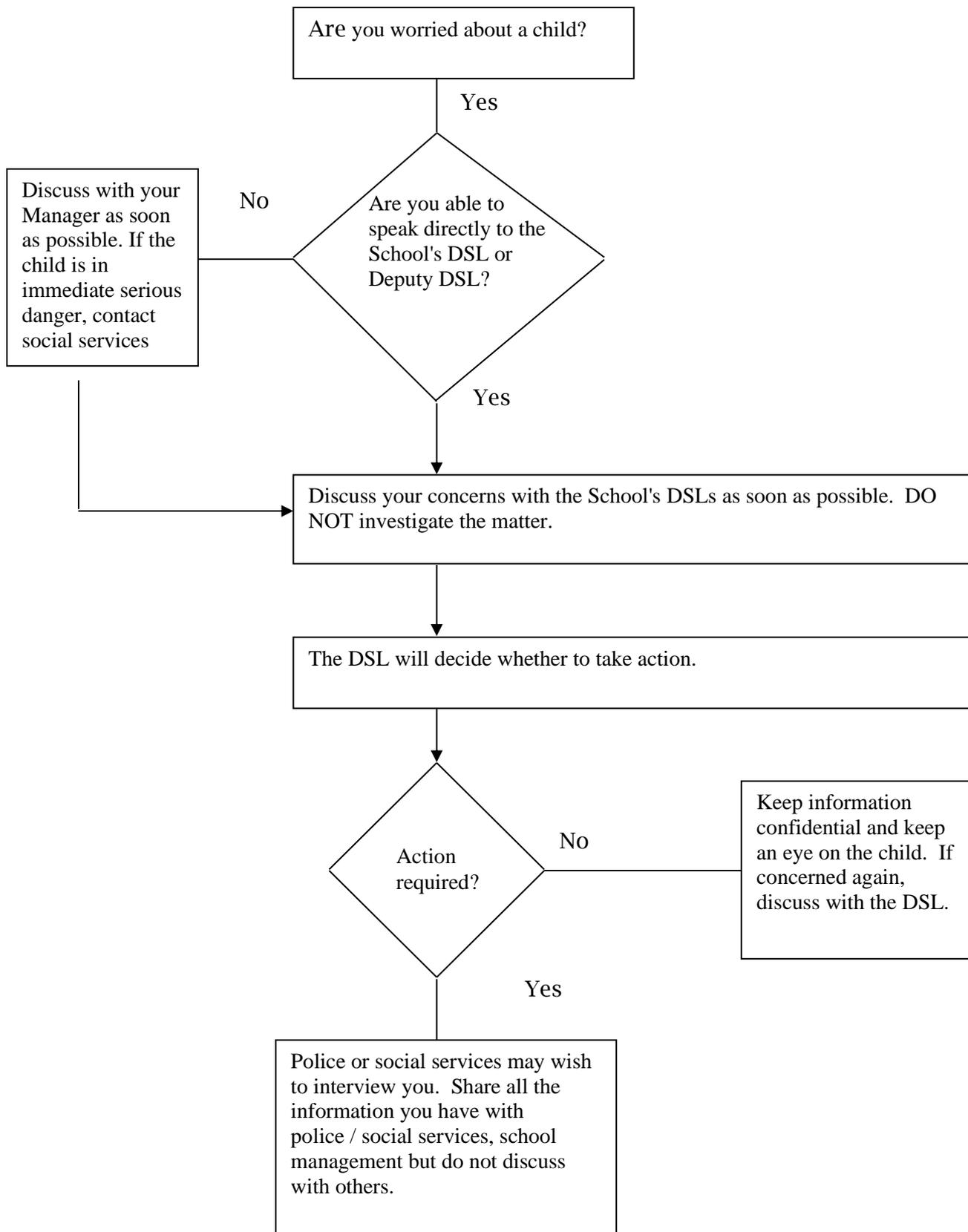
<p>The physical signs of FGM may include:</p> <ul style="list-style-type: none">• difficulty walking, sitting or standing• severe pain• bleeding• shock• inability to urinate• infections such as tetanus, HIV and hepatitis B and C	<p>Changes in behaviour that can also indicate FGM may include:</p> <ul 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
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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 2020))

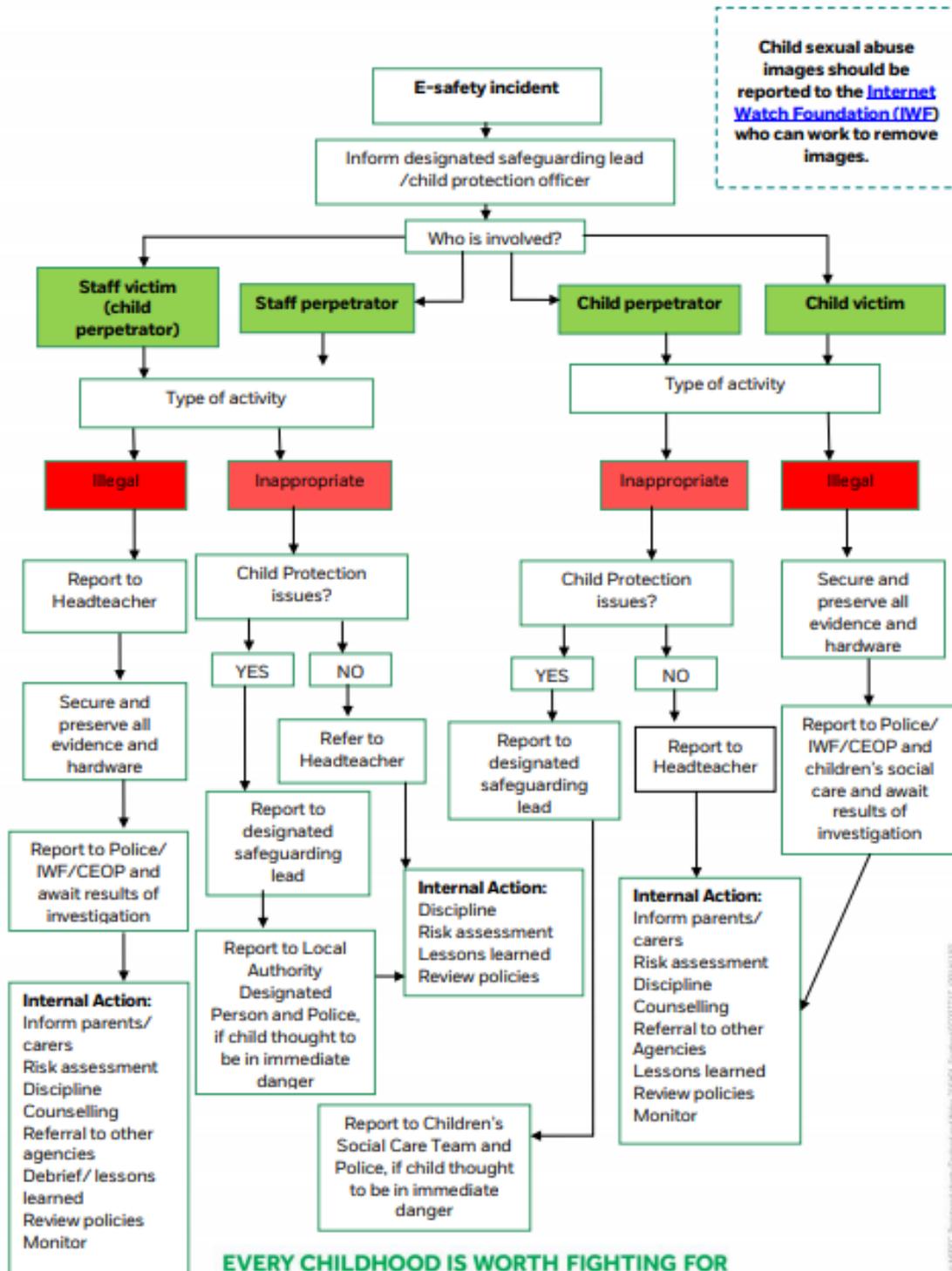
- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Honour-based abuse (formerly known as Honour Based Violence (HBV)) which include Female Genital Mutilation (FGM) and Forced Marriage
- Mental health
- Missing children and adults strategy
- Private fostering
- Preventing radicalisation
- Sexting
- Relationship abuse
- Trafficking

Appendix 3 Flowchart for a member of staff worried about a student.

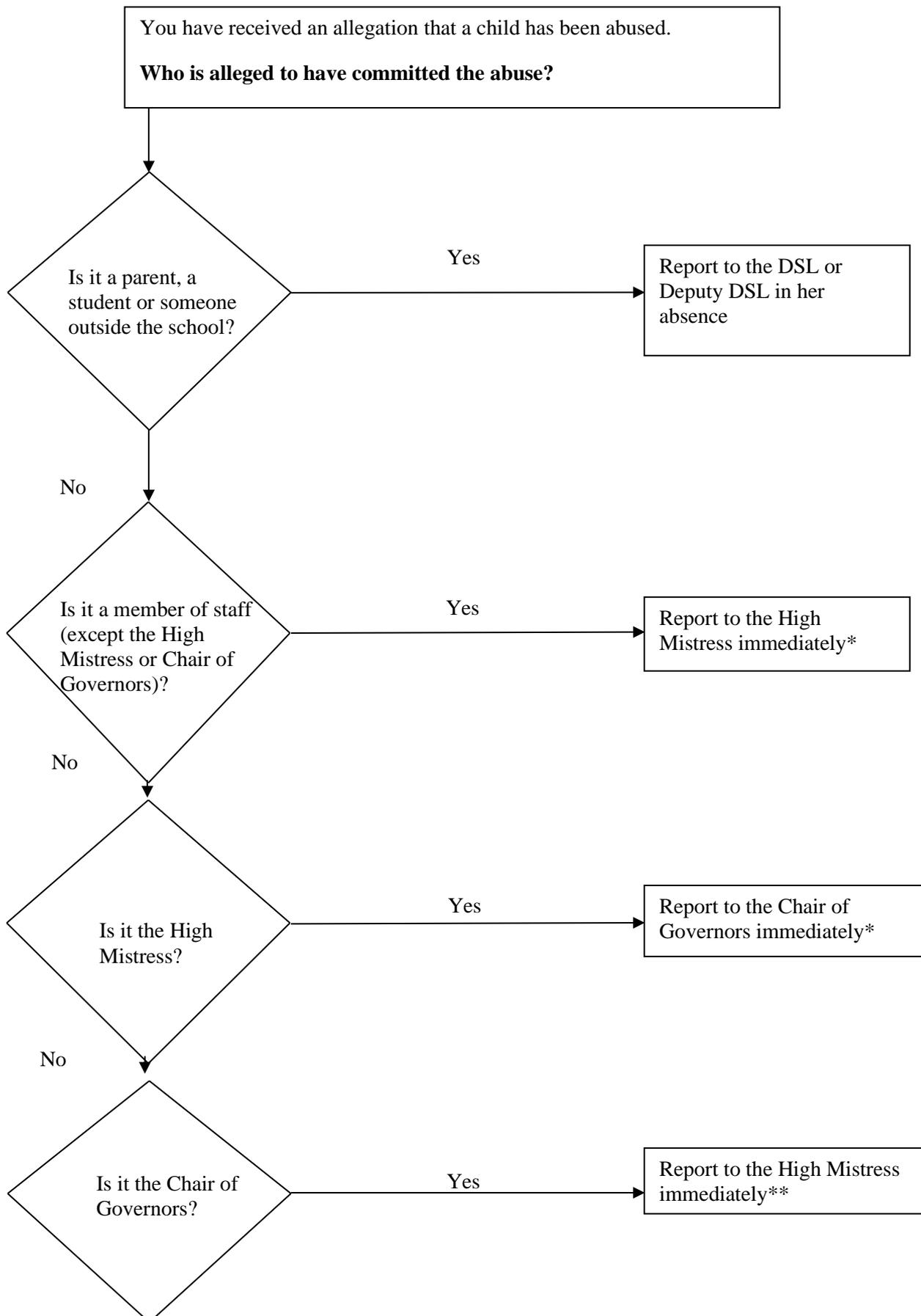




What to do if a pupil or a teacher reports an e-safety incident



Appendix 5 Allegations flowchart.



* The LADO must be contacted.

Appendix 6: COVID-19 Addendum to our Safeguarding (Child Protection) policy

In the event the government mandating an onsite closure of schools and a return to remote teaching and learning for staff and students, this addendum applies in full.

In the event of a hybrid model where some staff and students may be teaching and learning remotely on occasion due to circumstances arising from COVID-19 including (but not limited to): shielding, household members with underlying health conditions or vulnerabilities; exhibiting COVID symptoms; testing positive for COVID-19 and quarantining on return from abroad; staff must abide by the guidance laid out in this addendum.

The Safeguarding Policy is the overarching policy for all matters safeguarding and child protection and the fundamental principles of safeguarding and child protection remain the same: children always come first; staff should respond robustly to safeguarding concerns and contact the DSL in line with our established procedure.

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

The current school position and local advice

The school has temporarily moved to a remote teaching and learning model. In line with guidance from the government, the school will open for children of key workers or for vulnerable children. Parents who qualify should contact directorofpastoralcare@spgs.org; 020 7605 4892; 020 603 2288 (8am – to 4pm) with at least 24 hours' notice.

The school may operate a rota of supervision with other local schools. Such arrangements will be communicated to the students, staff and parents.

The DSL has written and will regularly review a safeguarding risk register in order to identify safeguarding risks to students.

Reporting arrangements

The school arrangements continue in line with our safeguarding (child protection) policy.

The Designated Safeguarding Lead is: Lizzie Beesley; lizzie.beesley@spgs.org; 020 7605 4892/ 020 7603 2288 (8am – 4pm), directorofpastoralcare@spgs.org

The Deputy DSLs are: Helen Semple; helen.semple@spgs.org 020 7605 1118/ 020 7603 2288, Jophy Lane: Josephine.lanel@spgs.org 020 7605 4817/ 020 7603 2288, Giles Bennett: Giles.bennett@spgs.org 020 7605 4803 and Kaarin Scanlon: Kaarin.scanlon@spgs.org 020 7605 4859 (8am – 4pm)

The following members of the Senior Management Team are also trained as safeguarding leads (level 3);

Andrew Ellams, Senior Deputy Head, Director of Studies

Fred Hitchcock, Deputy Head, Director of Co-Curriculum

Sarah Fletcher, High Mistress

The school's approach ensures the DSL or Deputy is always available to be contacted whilst the school is open, either in person or via phone or online video, for example when working from home.

Staff will continue to follow the safeguarding (child protection) policy and advise the DSLs immediately about concerns they have about any child, whether in school or not. The impact of COVID-19 means a need for increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a child is at risk of significant harm, there may be a need to be persistent in referring concerns to the local authority. The arrangements for contacting children services are:

Hammersmith and Fulham Initial Contact and Advice Team		020 8753 5125 020 8753 6610 / 6600 Out of hours: 020 8748 8588	
Hammersmith and Fulham Family Services Duty Line (works with the Initial Contact and Advice Team)		0208 753 6600 familyservices@lbhf.gov.uk	
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 07776 673 020	lado@lbhf.gov.uk megan.brown@slbhf.gov.uk

Identifying vulnerability

We have put in place specific term-time arrangements in respect of the following groups:

- Children subject to a child protection plan: in-school supervision offered; regular contact, at least weekly, with the allocated social worker; daily contacts with young person via form tutor, head of year or DSL
- Children who have, or have previously had, a social worker: regular contact, at least weekly, with the allocated social worker, with the family and with the young person via the head of year and DSL.
- Children on the edge of social care involvement or pending allocation of a social worker: regular contact, at least weekly, with family and young person via head of year or DSL
- Other children considered vulnerable; more children may be added to this group in response to concerns raised with the DSL. These children can be offered care at school if required.

In addition to the above, the school will have specific arrangements for children of key workers who need supervision.

The school has also made individual contact with families whose child is a recipient of a school bursary.

Pastoral Care

- During term time, form tutors should hold at least one form time and a PSHE session a week.
- Form tutors should contact their tutor group by email once a week.
- The director of pastoral care will continue to meet each head of year weekly during term time
- The pastoral team will continue to meet once weekly as a team during term time
- The tutor teams will meet with their head of year weekly during term time

The following arrangements are made for the children the school is concerned about, but who do not meet the 'vulnerable' definition:

- Form tutors should contact individual students of concern by email once a week
- Heads of Year will offer a regular and at least weekly video or audio conversation to those students of concern
- During term-time and during the holiday, the DSL will maintain weekly contact with students with pastoral and/or safeguarding concerns, either by email, audio or video conversations

If staff are concerned that a child does not turn their webcam on during an online lesson (Zoom), they may interact with them via the Chat function, ensuring the message is targeted to the student alone, to enquire if they need technical support to turn the camera on. Any sustained concerns should be passed on to the Designated Safeguarding Lead.

Additional help is available to students:

Childline

<https://www.childline.org.uk/>
Tel. 0800 1111

Samaritans

<https://www.samaritans.org/>
Tel. 116 123

Young Minds

<https://youngminds.org.uk/>
If you need urgent help text YM to 85258

MeeTwo (phone application)

<https://www.meetwo.co.uk/>

More helplines and guidance can be found in our [Mental Health and Wellbeing Policy](#).

Mental Health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of students and their parents. Teachers should be aware of this in setting expectations of students' work where they are at home.

Where the school is providing for children of critical workers and vulnerable children on site, it should ensure appropriate support is in place for them.

Existing provision of support will be accessible to all students (pastoral care through form tutors and heads of year; Learning Support; counselling and coaching), although it will be delivered in different ways, for example, video, audio, portal or email.

Attendance on site (children of key workers and those identified as vulnerable)

The school is following the attendance guidance issued by government. Where a child is expected and does not arrive, we will follow the school attendance procedure and make contact with the family. If contact is not possible by 10.00am, the DSL must be informed. The DSL will attempt a range of methods to contact the students, the parents, or the emergency contact, as per the Missing Student policy. If necessary, the school will arrange a home visit by another appropriate agency or by the school. A risk assessment will be undertaken to consider the implications of COVID-19 alongside other risks perceived to the child. The risk of COVID-19 does not override the duty on the school to ensure children and young people are safe.

Students' phone numbers will be collected by the DSL once attendance has been agreed between the school and the family or external agencies.

Staff will be aware of increased risk

The pressures on children and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area, poverty, and financial or health anxiety. These areas should be considered in the setting of any work for children to undertake at home (including recognising the impact of online learning - see below). Staff should be aware of the mental health of both children and their parents and carers, informing the DSL about any concerns.

Peer on peer abuse

We recognise the potential for abuse to go on between young people, especially in the context of the school's closure. Our staff will remain vigilant to the signs of peer-on-peer abuse,

Students should report any such concerns to their form tutor or head of year using school email. The pastoral team will address the concerns as per the school's policies. Safeguarding principles continue to apply, and any serious concerns should be reported directly to the Designated Safeguarding Lead.

Risk online

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

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the rest of this policy and where appropriate referrals should be made to children's social care and as required, to the police.

- The school will continue to ensure that appropriate filters and monitoring systems are in place to protect children when they are online on the school's IT systems or recommended resources. The Director of Strategic Development has oversight of all IT arrangements. A contingency has been agreed in case IT staff become unavailable.
- Our governing body will review arrangements to ensure they remain appropriate
- The school has taken on board guidance from the UK Safer Internet Centre on safe remote learning and guidance for safer working practice from the Safer Recruitment Consortium. We have reviewed the Acceptable Use policies for both staff and students.

- Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the school's Code of Conduct and importance of using school systems to communicate with children and their families.
- Children and young people accessing remote learning receive guidance on keeping safe online and know how to raise concerns with the school, [Childline](#), the [UK Safer Internet Centre](#) and [CEOP](#).
 - [Childline](#) - for support
 - [UK Safer Internet Centre](#) - to report and remove harmful online content
 - [CEOP](#) - for advice on making a report about online abuse
- Parents and carers have received information about keeping children safe online with peers, the school, other education offers they may access and the wider internet community. We have set out the school's approach, including the sites children will be asked to access and set out who from the school (if anyone) their child is going to be interacting with online. Parents have been offered the following links:
 - [Internet matters](#) - for support for parents and carers to keep their children safe online
 - [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
 - [Net-aware](#) - for support for parents and carers from the NSPCC
 - [Parent info](#) - for support for parents and carers to keep their children safe online
 - [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
 - [UK Safer Internet Centre](#) - advice for parents and carers
- Free additional support for staff in responding to online safety issues can be accessed from the [Professionals Online Safety Helpline at the UK Safer Internet Centre](#).

Staff should take a register for every Zoom lesson and follow any absence by emailing the student, copying in the form tutor and the head of year. The head of year will track the student's absence and will take action as necessary.

Allegations or concerns about staff

The school may operate as part of a hub for key workers and vulnerable children. Young people could be at greater risk of abuse due to arrangements which are outside of our normal working practice. We will put in place robust safeguarding arrangements and remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the DSL.

Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

If necessary, the school will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult, and to the Teacher Regulation Agency in line with paragraph 166 of Keeping Children Safe in Education 2020 using the address Misconduct.Teacher@education.gov.uk.

New staff or volunteers

New starters must have a video induction before starting or on their first morning with the DSL or a deputy. They must read the school Safeguarding (Child Protection) policy, the Behaviour policy, the Whistleblowing policy and the Staff Code of Conduct. The DSL or

deputy will ensure new recruits know who to contact if worried about a child and ensure the new starters are familiar with the child protection procedure.

If staff or volunteers are transferring in from other registered education or childcare settings for a temporary period to support the care of children, we will seek evidence from their setting that:

- the member of staff has completed relevant safeguarding training in line with other similar staff or volunteers,
- they have read Part I and Annex A of Keeping Children Safe in Education, and
- where the role involves regulated activity and we have received confirmation that the appropriate DBS check has been undertaken by that setting we will undertake a written risk assessment to determine whether a new DBS would need to be undertaken. It may be in these exceptional times we can rely on the DBS undertaken by their setting.

New starters and volunteers will complete the Educare online courses within their first week.

Our child protection procedures hold strong:

- Volunteers may not be left unsupervised with children until suitable checks have been undertaken. People supervising volunteers must be themselves in regulated activity, able to provide regular, day to day supervision and reasonable in all circumstances to protect the children.
- The school will undertake a written risk assessment on the specific role of each volunteer to decide whether to obtain an enhanced DBS check (with barred list information) for all staff and volunteers new to working in regulated activity in line with DBS guidance.
- When undertaking ID checks on documents for the DBS it is reasonable to initially check these documents online through a live video link and to accept scanned images of documents for the purpose of applying for the check. The actual documents will then be checked against the scanned images when the employee or volunteer arrives for their first day.
- The school will update the Single Central Record of all staff and volunteers working in the school, including those from other settings. This will include the risk assessment around the DBS. A record will be kept by the designated member of staff who is working in the school each day.

New children at the school

Where children join our school from other settings, we will require confirmation from the DSL whether they have a Safeguarding File or SEN statement/EHCP. This file must be provided securely **before** the child begins at our school and a call made from our DSL or a deputy to the placing school's DSL to discuss how best to keep the child safe. In some unusual circumstance this may not be possible. Information provided must include contact details for any appointed social worker and where relevant for the Virtual School Head. Safeguarding information about children placed in our school will be recorded on our safeguarding system, will be securely copied to the placing school DSL and will be securely returned to the placing school on completion of the child's placement with us so there is a continuous safeguarding record for the child.

The DSL will undertake a risk assessment in respect of any new information received, considering how risks will be managed and which staff need to know about the information. This will be recorded on our safeguarding recording system.