

Safeguarding (Child Protection) policy

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Staff Portal	✓	
School website	✓	



Safeguarding (Child Protection) policy

Who this policy applies to

This policy applies to all members of the school's community, including students, parents, employees, temporary staff, contractors, agency workers, visiting music teachers and other peripatetic workers, volunteers, governors and all other people when working in or for the school. It applies whenever staff or volunteers are working with students, even where this is away from the school, e.g., on a school trip.

What this policy is for

This policy aims to:

- Safeguard and protect the school community
- Promote a culture of safeguarding awareness
- Look after the vulnerable in the community
- Inform about the practices and procedures pertaining to safeguarding and child protection

Legal framework

- Keeping Children Safe in Education 2024
- Working Together to Safeguard Children 2023
- Education (Independent School Standards) (England) Regulations 2014
- Part 3 and Part 4 of ISI Regulatory Requirements
- The Voyeurism (Offences) Act 2019
- Equality Act (2010)
- Children Act (1989)

Other relevant school policies

- Child-on-Child Abuse policy
- Mental Health and Wellbeing policy
- Anti-bullying policy
- Behaviour (including rewards and sanctions) policy
- Low Level Concerns policy
- PSHE and RSE policy
- Staff Code of Conduct
- Educational visits
- Health and Safety and Instruction Notices
- Staff Acceptable Use policy (AUP)
- Student Acceptable Use policy (AUP)
- Learning Support
- Missing Student
- Mobile Phone
- Substance Misuse Management and Education
- Student Search and Confiscation
- Online safety
- Staff Safer Recruitment and Selection
- Volunteer management
- Visitors' policy
- Whistleblowing policy

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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 (including supply staff), volunteers, visitors and parents of both current and prospective students and is published on the school website. Hard copies are available to parents on request. This policy can be made available in large print or other accessible formats if required. It applies wherever staff, volunteers, visitors, and parents 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 Secretary of State for Education's (DfE) *Keeping Children Safe in Education* (September 2024) as providing help and support to meet the needs of children as soon as problems emerge; 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 child on child abuse (for further information see 6.2 and Appendix 2). 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. The school recognises that in accordance with the Equality Act (2010) we should not discriminate against students because of their protected characteristics (race, gender reassignment, sex, disability, sexual orientation, age, pregnancy, maternity, religion or belief, marriage or civil partnership). We recognise that we have a duty to consider how we are supporting children with protected characteristics and take positive action, where appropriate, to deal with the disadvantages faced by students. For example, making reasonable adjustments for disabled students or supporting girls who are disproportionately subject to sexual violence. The school community should be conscious that students with protected characteristics may be more at risk of harm and adjust their policies accordingly.
- 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 are still being 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** governors, staff, volunteers, visitors, and parents 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.

2.2. The school will take all reasonable measures to:

- ensure that we practise **safer recruitment** in checking the suitability of staff, governors 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 2024) 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 2024);
- 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 individuals 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 individuals and that any such checks do not raise any issues of concern in relation to the suitability of those individuals to work with children;
- ensure that its safeguarding arrangements follow the procedures and practice of the Lead Safeguarding Partner (LSP) 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: [LSCP: Thresholds of need guide | LBHF](#);
- ensure that early help support is provided as soon as a problem emerges. Early help is support for all children that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. The DSL and DDSLs understand that they need to know what the local early help process is and how and where to access support;
- be particularly alert to the potential need for early help for a child who: is disabled or has certain health conditions and has specific additional needs; has special educational needs (whether or not they have a statutory Education, Health and Care Plan); has a mental health need; is a young carer; is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines; is frequently missing/goes missing from education, home or care; has experienced multiple suspensions, is at risk of being permanently excluded from school, and in Alternative Provision or a Pupil Referral Unit; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of being radicalised or exploited; has a parent or carer in custody, or is affected by parental offending; is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse; is misusing

alcohol and other drugs themselves; is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced marriage; is a privately fostered child.

- 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 and maintain an attitude of 'it could happen here';
- 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, including mental health needs;
- 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 for Schools & Colleges: When to Call the Police](#)
- have regard to statutory guidance issued by the 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, staff, and volunteers 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

3.1. 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 (including supply teachers), the Designated Safeguarding Lead (DSL) 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 DSL to the Local Authority Designated Officer (LADO) within one working day. If the DSL is making the referral, they 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 a supply teacher 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.
- if an allegation is regarding when an individual or organisation is using the school premises, the school should inform the LADO and follow the safeguarding procedures outlined in this policy.

- if the allegation is against the High Mistress, the person receiving the allegation should immediately inform the Chair of Governors, or in their 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 their 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 connected to the school and the child has suffered harm or is at risk of harm, the matter will be referred by the DSL **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 (Board) takes seriously its responsibility to uphold the aims of the school as a 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 DSL at least termly and reports to the Board at each Board meeting.
- 4.2. The Board will ensure an appropriate senior member of staff, from the senior management team (SMT), is appointed to the role of DSL. The DSL will take lead responsibility for safeguarding and child protection at the school.
- 4.3. Parents are welcome to approach the DSL 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 DSL in accordance with these procedures.
- 4.4. The High Mistress is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis.

Whole school approach to safeguarding

- 4.5. The Board will ensure safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies of the school will operate with the best interests of the child at their heart.
- 4.6. Where there is a safeguarding concern, staff should take children's wishes and feelings into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously, and they can safely express their views.
- 4.7. Systems for reporting a safeguarding concern are detailed on the student portal and are reinforced in PSHE lessons, tutorials and by the Wellbeing Team and pastoral staff. Students are aware that they can report a safeguarding concern to any member of staff, but, where possible, should try and speak to the DSL or a DDSL first. The photographs and contact details of all the Safeguarding Team are posted in every classroom around the school. There is also a hierarchy of the Safeguarding team and the DSL roles posted in the staffroom and relevant staff office areas. All staff are reminded of roles and hierarchy annually or when there is a change in personnel.
- 4.8. **The main responsibilities of the DSL include:**
 - to refer all cases of suspected abuse to the local authority children's social care

- to liaise with the local Channel programme if a child is deemed to be at risk of radicalisation
- refer cases where a crime may have been committed to the police as required
- to notify the DBS if the school ceases to use the services of a member of staff, including supply staff (or a governor or volunteer) because they are unsuitable to work with children
- act as a point of contact with the three safeguarding partners (the local authority; a clinical commissioning group for an area, any part of which falls within the local authority; and the chief officer of police for a police area, any part of which falls within the local authority area)
- to act as a source of support, advice and expertise to governors, staff, volunteers, visitors, and parents on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- ensure governors, staff, volunteers, visitors, and parents have access to, and understand, the school's Safeguarding policy and procedures, especially new and part time staff
- to co-ordinate the child protection procedures in the school
- to maintain an ongoing safeguarding, child protection and online safety training programme for all governors, staff, volunteers, and other individuals working at the school, including induction training for all such individuals, regular updates for all staff and ensuring that training is refreshed every two years
- to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme etc
- 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* (December 2023). 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 LSP 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 DSL
- 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), which must be done within 5 days for an in-year transfer and within the first 5 days of a new school term; and

- keep and maintain records of staff training on child protection and safer recruitment procedures.

The DSL or Deputy Designated Safeguarding Leads should always be available to discuss safeguarding concerns during school hours. If in exceptional circumstances, the DSL or DDSLs 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 DDSLs as soon as practically possible.

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

4.10. The DSL for the school site is **Sophie McGeoch** (Deputy Head, Director of Safeguarding and Inclusion) who may be contacted on 020 7605 1118.

5. If the DSL is unavailable, her duties will be carried out by one of the DDSLs who have received appropriate training. The DDSLs are Lizzie Beesley (Deputy Head, Director of Pastoral Care) who may be contacted on 020 7605 4892; Rupert Try (Deputy Head, Director of Senior School) who may be contacted on 020 7605 4817; Chloe Lallyett (Head of Lower School) who may be contacted on 020 7605 4893; Bryony Gough (Head of Middle School) who may be contacted on 020 7605 1128, and Sydne Derbyshire (Head of UIV) who may be contacted on 020 7605 1106.

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

6. Types of abuse

6.1. 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children on all forms of domestic abuse, including where they see, hear or experience its effects. 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:

6.1.1. **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.

6.1.2. **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.

- 6.1.3. **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).
- 6.1.4. **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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6.1 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.

6.2 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and DDSLs) should consider whether children are at risk of abuse or exploitation in situations outside their families. 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.

7 Safeguarding issues

7.1 All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, inexplicable and/or persistent absences from education, and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

7.2 Child on child abuse

The school operates a zero-tolerance approach to any form of child-on-child abuse. All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse.

All child-on-child abuse is unacceptable and will be taken seriously. Staff must be aware that children may be abused out of school and should not minimise the potential risks of girl-on-girl abuse. All staff should understand, that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy). Further information can be found in the school's Child on Child Abuse policy, which is available on the school's website and student portal.

7.3 Child on child sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse. Staff might also overhear conversations that suggest a child has been harmed or might receive a report from a friend of the child. Reports should be reviewed regularly to identify potential patterns of concerning, problematic or inappropriate behaviour.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. Reports of child-on-child bullying abuse should never be dismissed as 'banter' or 'boys will be boys'. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain to children that the law is in place to protect, rather than, criminalise them.

When responding to allegations which are found to be unsubstantiated, unfounded, false, or malicious, the DSL should consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else.

7.4 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CSE is a form of sexual abuse and can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship.

7.5 **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.

7.6 Female Genital Mutilation (FGM)

Whilst all staff should speak to the DSL (or DDSs) 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 whether or not at the school, or that they believe that the girl is at risk of FGM, 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 p.153 of Keeping Children Safe in Education Annex A (September 2024).

7.7 Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act came into force 12 April 2019. The school is aware that upskirting is a criminal offence. Upskirting is defined as typically involving taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

7.8 Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- *psychological;*
- *physical;*
- *sexual;*
- *financial; and*
- *emotional.*

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame itself for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. All of this can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

7.9 Mental Health

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.

Where children have suffered abuse, neglect and exploitation, 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.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken. Staff should immediately refer their concern to the DSL (or DDSLs).

Further guidance is given at Appendix 2. Staff will also find it useful to refer to the DfE's guidance '[Mental health and behaviour in schools](#)' (2018).

8 Signs of abuse

8.1 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 shows signs of substance misuse
- 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.

8.2 Signs of grooming, sexual exploitation, or sexual abuse 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.

- 8.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or they are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

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).

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 DSL 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 susceptible 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 DSL will continue existing partnership arrangements and keep open lines of communication with the Lead Safeguarding Partner (LSP). The school needs to ensure that it is part of discussions relating to child protection with statutory safeguarding partners, for example, the Hammersmith and Fulham LADO.

9.6 Staff training

The DSL and DDSs 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 and governors have been made aware of the Prevent Duty through training.

9.7 IT

Suitable filtering and monitoring systems are implemented and 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 the school's 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 DSL 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 Children potentially at greater risk of harm

10.1 Children who need a social worker (Child in Need and Child Protection Plans (CIN))

Children may need a social worker due to safeguarding or welfare needs. Children on CIN or Child Protection (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. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

The allocation of a social worker to a child should inform decisions about safeguarding, for example responding to unauthorised absence or missing education where there are known safeguarding risks, and about promoting welfare, for example allocating pastoral and/or academic support.

10.2 Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation 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
- being more prone to peer group isolation than other children
- 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.

10.3 Children who are LGBT+

The school is aware that the fact that a child or a young person may be LGBT+ is not in itself an inherent risk factor for harm. However, children who are LGBT+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+. Risks can be compounded where children who are LGBT+ lack a trusted adult with whom they can be open. The school endeavours to reduce the additional barriers faced and provide a safe space for students to speak out or share their concerns with members of staff, such as through the Spectrum society. The Personal, Social and Health Education (PSHE) and Relationship and Sex Education (RSE) programmes provide education and awareness to counter homophobic, biphobic and transphobic abuse.

10.4 Elective Home Education

The school is aware that although many children have positive experiences of home education, for some children it means they are less visible to services that are there to keep them safe and supported. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will work with the LA and other key professionals to coordinate a meeting with parents/carers where possible to ensure the parents/carers have considered what is in the best interests of each child, ideally before a decision is made.

10.5 Private fostering

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. The school understands that where the arrangements come to the attention of the school (and the school is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

11 Online Safety

11.1 It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school operates a whole school approach to online safety empowering us to protect and educate students, and staff in their use of technology. The breadth of issues classified within online safety can be categorised into four main areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful material
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- 11.2 The Governing Board is responsible for ensuring that the school does all that they reasonably can to limit children's exposure to the above risks from the school's IT system. The school has appropriate filters and monitoring systems in place, and gives due consideration to the students' age range, their frequency of access and the proportionality of costs versus risks.
- 11.3 The school will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSL and any parental engagement and support, whilst keeping abreast of technological advancements that may necessitate changes to our online safety protocols.
- 11.4 The school network is configured to provide safeguarded, secure, and robust systems to support teaching & learning at school. The condition for bringing personal devices onsite is that individuals must only access the internet through the school WiFi using their school login and password. The use by students of personal data plans, for example 4G/5G mobile networks, for access to the internet while in school is expressly forbidden. Personal devices must not be used to capture images or recordings without the express permission of the individual(s) being photographed/recorded and should be deleted if requested.
- 11.5 Further details of the school's approach to online safety and mobile and smart technology can be found in the school Acceptable Use policies and the Online Safety policy. Failure to follow the rules on personal devices set out in this policy may result in the confiscation of devices and the individual, or group withdrawal of permission to use personal devices in school, or further sanctions in line with the school's Behaviour policy.
- 11.6 The school reviews its online safety procedures annually and ensures that all staff understand the systems in place, how to manage them effectively and how to escalate concerns when identified.
- 11.7 There are filtering and monitoring systems in place which are checked at least weekly by the DSL team. Any concerns are followed up by a member of the DSL team. The IT and DSL teams and the Online Safety Officer work together to ensure a robust understanding of the systems, to train staff and to identify, manage and record concerns. DfE Guidance on Meeting digital and technology standards in schools and colleges can be found [here](#).
- 11.8 The safeguarding governor includes a review of filtering/monitoring systems and an audit of incidents relating to online behaviour in the annual safeguarding audit.

12 Responsibility of all staff, governors, and volunteers

- 12.1 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;
 - To recognise that written records are particularly important in the case of providing evidence should a complaint be made against the school as to how a case has been handled; and
 - To report any matters of concern to the DSL.

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, and the Anti-bullying policy.

12.2 Training

All staff will undertake appropriate training including refresher training in accordance with advice provided by the Lead Safeguarding Partner (LSP) 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.

12.3 All staff are trained to manage a report of child-on-child sexual violence and sexual harassment.

12.4 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 DSL), the Staff Code of Conduct, the Staff Acceptable Use policy, the school Behaviour policy, the Whistleblowing policy, the identity of the DSL and his/her Deputies and a copy of Part 1 and Annex B of the DfE's *Keeping Children Safe in Education* (September 2024). All staff are required to read Part 1 and Annex B of this guidance each time it is updated. SMT and the online-safety coordinator and online-safety officer are responsible for reading Annex C (Online Safety) of this guidance.

12.5 Online safety training should be integrated, aligned, and considered part of the whole school safeguarding approach and wider staff training and curriculum planning. It is a component of new staff induction. All students are taught about safeguarding, including online safety.

12.6 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. Further detail on whistleblowing procedures is outlined in the school's Whistleblowing policy.

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

13.1 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.

13.2 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 with the detail being recorded in the child's own words where possible. 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 DSL as soon as possible. The record can be entered directly on My Concern /

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 DSL or the High Mistress.
- Only share information on a need-to-know basis and see section on information sharing below.

13.3 Staff are made aware of the difference between a concern about a child (**section 17 – child in need**) and a child in immediate danger or at risk from significant harm (section 47 – child protection). In the former, staff should discuss their concern with the DSL although they may make a direct referral to Children’s Social care. They must inform the DSL as soon as possible that a referral has been made. In the case of a child being in immediate danger or at risk from significant harm, a member of staff can make a referral to Children’s Social Care or the Police immediately. The member of staff must inform the DSL that a referral has been made as soon as possible.

13.4 Nudes and semi-nudes:

13.4.1 The UK Council for Internet Safety (UKCIS) guidance, ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’¹, defines sharing nudes and semi-nudes as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

13.4.2 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 nudes or semi-nudes created by another person under 18.

13.4.3 Incidents not covered by the guidance:

- Under-18s sharing adult pornography.
- Under-18s sharing sexual texts without nudes or semi-nudes.
- Adults sharing nudes or semi-nudes of under-18s. (This is child sexual abuse and must always be reported to police as a matter of urgency).

13.4.4 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.’

13.5 The Law:

13.5.1 Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal under The Voyeurism (Offences) Act 2019. This includes imagery of yourself if you are under 18. ‘Indecent’ is not defined in law, but images are likely to be considered indecent if they depict:

- nude or semi-nude sexual posing e.g., displaying genitals and/or breasts or overtly sexual images of young people in their underwear
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals.

¹ [Sharing nudes and semi-nudes: how to respond to an incident \(overview\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview)

13.5.2 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.

13.5.3 The National Police Chiefs' Council (NPCC) is clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children. Schools may respond to incidents without involving the police. However, in some circumstances (determined by the DSL), the police must always be involved.

13.6 **Crime recording:**

13.6.1 When an incident of sharing nudes and semi-nudes is reported to police, they must record this as a crime. The incident is listed as a crime, and the young person is the suspect. This is not, however, 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 sharing nudes and semi-nudes: *Outcome 21*. This outcome code allows the police discretion not to take further action if it is not in the public interest. Using this outcome code is likely, although not guaranteed, 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.

13.7 **Handling incidents:**

13.7.1 Refer to the DSL immediately. The DSL will meet with the young person / people involved. In the meantime:

- Do not view, copy, print, share, store or save the image yourself or ask a child to share or download - this is illegal. In exceptional circumstances, it may be necessary for the DSL only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL.
- If you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support. Record the fact that the images were viewed, along with reasons for doing so and who was present. Sign and date this record.
- Do not delete the imagery or ask the young person to delete it until advised to do so by the DSL.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Confiscate the device, switch off the device and place the device in a sealed (and signed and dated) envelope.
- Explain to the young person that you need to report it and reassure them that they will receive support and help from the DSL.
- If there is any concern, the young person is at risk of harm, social care or the police should be contacted.

13.7.2 Always refer to the police or social care if the 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).

13.7.3 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.

13.8 Assessing the risks once the images have been shared:

13.8.1 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 nudes or semi-nudes before?

13.9 Preserving evidence:

13.9.1 All evidence, (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved and given to the DSL.

13.10 Deleting images (from devices and social media):

13.10.1 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.

13.11 Reporting:

13.11.1 All suspicion or complaints of abuse must be reported to the DSL or DDSs, 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 DSL, the DDSs 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.

13.12 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 My Concern / CPOMs or given to the DSL in person. In an emergency, the DSL or a DDSL must always be phoned immediately.

13.13 **Data protection information/information sharing:**

13.13.1 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.

13.13.2 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. DfE Data protection guidance for schools, helps school staff, governors and trustees understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches. 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.

13.13.3 When considering what information to share, the protection of the child must always be the most important consideration. Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. 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.

13.13.4 **Student child protection records:** The DSL 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 2023). The DSL 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. Records should include:

- detailed, accurate, secure written records of *all* concerns;
- details of discussions and decisions made including the rationale for those decisions, including instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme etc;
- a note of any action taken, decisions reached and the outcome.

13.13.5 The DfE has provided a Data Protection toolkit for Schools - Data Protection: a toolkit for schools.

13.14 **Action by the DSL 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 DSL 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 DSL is concerned that disclosing information to parents would put a child at risk, they 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.

13.15 **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, it is important that a referral to local authority children's social care and if appropriate the police, (*see [when to call the police: guidance for schools and colleges](http://npcc.police.uk) (npcc.police.uk)*) is made immediately. Referrals should follow the local referral process. 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 DSL 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 DSL 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 DSL 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 LSP 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 DSL will confirm the referral in writing to social services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact social services again.

- Where a disclosure relates to the mental health of a student and they are at risk from themselves rather than a third party, the DSL 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.
- Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the school provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. It is important to understand inter-familial harm, and any support required for siblings following incidents. It is vital to understand safeguarding concerns both within and outside school.

13.16 **Multi-agency working:**

The school will work with external agencies and in accordance with guidance outlined in *Working together to Safeguard Children* (July 2023). 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 LSP so that it can perform its function as required under the Children Act 2004.

14 **Mandatory notification of questionable / defined conduct**

14.1 All teachers and staff are mandated to notify the DSL:

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

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

14.1.1.2 unsupervised access to a child in changing, sleeping in non-public accommodation at the school or on school trips.

14.1.1.3 the use of sexually inappropriate language, references, or jokes; and

14.1.1.4 and other private communication outside of the school's defined social and social media policies.

15 **Allegations against staff**

15.1 This part of the policy has two sections covering the two levels of allegation/concern:

I. Allegations that may meet the harms threshold.

II. Allegations/concerns that do not meet the harms threshold – referred to as 'low level' concerns.

15.2 **Allegations that may meet the harms threshold:** 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, section one of *Keeping Children Safe in Education (September 2024)* 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.
- 15.3 **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.
- 15.4 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.
- 15.5 **Allegations/concerns that do not meet the harms threshold – ‘Low level concerns’:** For further detail on the school’s approach to low level concerns, please see the ‘Reporting Low Level Concerns Policy’ on the staff portal.
- 15.6 As part of the whole school approach to safeguarding, the school will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers, and contractors) are dealt with promptly and appropriately. The school’s aim is to create an environment where staff are encouraged and feel confident to self-refer if they have found themselves in a situation which might be misinterpreted, or they have behaved in a way that falls below professional standards.
- 15.7 The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above.
- 15.8 A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the school may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
 - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- Examples of such behaviour could include, but are not limited to:
- being over friendly with children
 - having favourites
 - taking photographs of children on their mobile phone
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
 - using inappropriate sexualised, intimidating, or offensive language.
- 15.9 Low-level concerns about a member of staff should be reported to the High Mistress. Where a low-level concern is raised about the High Mistress, it should be reported to the Chair of Governors.
- 15.10 All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g., where it is necessary for a fair disciplinary hearing. The High Mistress should collect as much evidence as possible by

speaking both to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses.

- 15.11 Records should be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken.

16 Allegations against students (child on child abuse)

- 16.1 All staff should be clear as to the school's policy and procedures with regards to child-on-child 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 child-on-child abuse, the child protection procedures set out in this policy should be followed and the DSL 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. See the school's child-on-child abuse policy for further information.

17 Informing parents

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

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:

18.1.2 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 2024) 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.

18.1.3 Students who are absent from education: A child going missing from education or being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues or is a potential indicator of abuse. The school understands the importance of tracking patterns of absence and putting in early interventions for students who fall below 90% attendance. This early intervention is particularly important for vulnerable children and children with a social worker or known to children's social care. The school will follow up on the absence of any student on a CIN or CP plan after two days.

- 18.2 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.

- 18.3 **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 DSL will assess the risk and may put in place a care plan that may be shared with relevant teachers.

- 18.4 **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.

- 18.5 **School premises:** The school takes all practicable steps to ensure that school premises are as secure as circumstances permit.
- 18.6 Where the school hires or rents out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) it will ensure that appropriate arrangements are in place to keep children safe, including seeking assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, and inspecting these as needed. There should also be arrangements in place to liaise with the hiring body on these matters where appropriate.
- 18.7 The Governing Body should also ensure that safeguarding requirements are included in the transfer of control agreement (i.e., lease or hire agreement) as a condition of use and occupation of the premises and that a failure to comply with this would lead to termination of the agreement.

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 DSL 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 safeguarding review on behalf of the Board, will meet with the DSL, other senior staff, groups of staff and students 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
DSL	Sophie McGeoch (Deputy Head, Director of Safeguarding & Inclusion)	020 7605 1118	Sophie.mcgeoch@spgs.org
Deputy Designated Safeguarding Lead	Lizzie Beesley (Director of Pastoral Care)	020 7605 4892	directorofpastoralcare@spgs.org
Deputy Designated Safeguarding Lead	Rupert Try (Director of Senior School)	020 7605 4817	Rupert.Try@spgs.org
Deputy Designated Safeguarding Lead	Chloe Lallyet (Head of Lower School)	020 7605 4893	chloe.lallyett@spgs.org

Deputy Designated Safeguarding Lead	Bryony Gough (Head of Middle School)	020 7605 1106	bryony.gough@spgs.org
Deputy Designated Safeguarding Lead	Sydney Derbyshire (Head of UIV)	020 7605 1128	sydne.derbyshire@spgs.org
High Mistress	Sarah Fletcher	020 7605 4801	hmpa@spgs.org
Chair of Governors	Simon Wathen	simon.wathen@spgs.org Geeta.khehar@spgs.org	
Governor with responsibility for Safeguarding	Geeta Khehar	Zeina.Bain@spgs.org You may also contact the Secretary to the Governors, Mrs Nicki Goodfellow: St Paul's Girls' School, Brook Green, London, W6 7BS Telephone: 0207 605 1125 or out of hours: 07946 116130 Nicki.goodfellow@spgs.org	
Deputy Chair of Governors	Zeina Bain		

Local safeguarding partnership arrangements

Multi-agency arrangements for safeguarding children are 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	Lara Thompson	Direct Line: 020 8753 2259/main office number: 020 8753 5125 Mobile phone 07776 673 020	LADO@lbhf.gov.uk
Safeguarding Education Manager (London Borough Hammersmith and Fulham)	Initial Consultation and Advice Team (ICAT)	020 8753 6610 Out of hours service: 020 8748 8588	familyservices@lbhf.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 <i>or</i> , 4227	020 8770 5000
Richmond	020 8891 7969	020 8744 2442
Wandsworth	020 8871 6622	020 8871 6000
Westminster	020 7641 4000	020 7641 6000

The Local Safeguarding Children Board (LSCB) - 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 on 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:

[Welcome to lscp | lscp \(rbkc.gov.uk\)](http://www.rbkc.gov.uk/lscp)

[Hammersmith and Fulham's Local Safeguarding Partnership \(hflscp.co.uk\)](http://hflscp.co.uk)

If the DSL 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
LSP Manager	Emma Biskupski (interim)	020 8753 3914	hflscb@lbhf.gov.uk
LSP 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

Complies with The Education (Independent School Standards) (England) Regulations 2014 and DfE guidance *Keeping Children Safe in Education* (September 2024) and *Working Together to Safeguard Children* (December 2023)

Appendix 1 Allegations against staff

1. 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.
2. **Allegations against staff:** Where an allegation or complaint is made against any member of staff, governor, volunteer, or the DSL, the matter should be reported immediately to the High Mistress. Where appropriate, the High Mistress will consult with the DSL 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.
3. **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.
4. **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.
5. **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.
6. **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.

7. **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.
8. It may be necessary to undertake a further investigation to determine the appropriate action. If so, the Local Authority Designated Officer (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.
9. **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.
10. 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.
11. 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.
12. 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.
13. **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:
14. **Substantiated:** there is sufficient identifiable evidence to prove the allegation.
15. **False:** there is sufficient evidence to disprove the allegation.
16. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

17. **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.
18. **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.
19. **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.
20. **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.
21. **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.
22. **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.
23. **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.
24. 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.
25. 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.
26. **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.

27. **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.

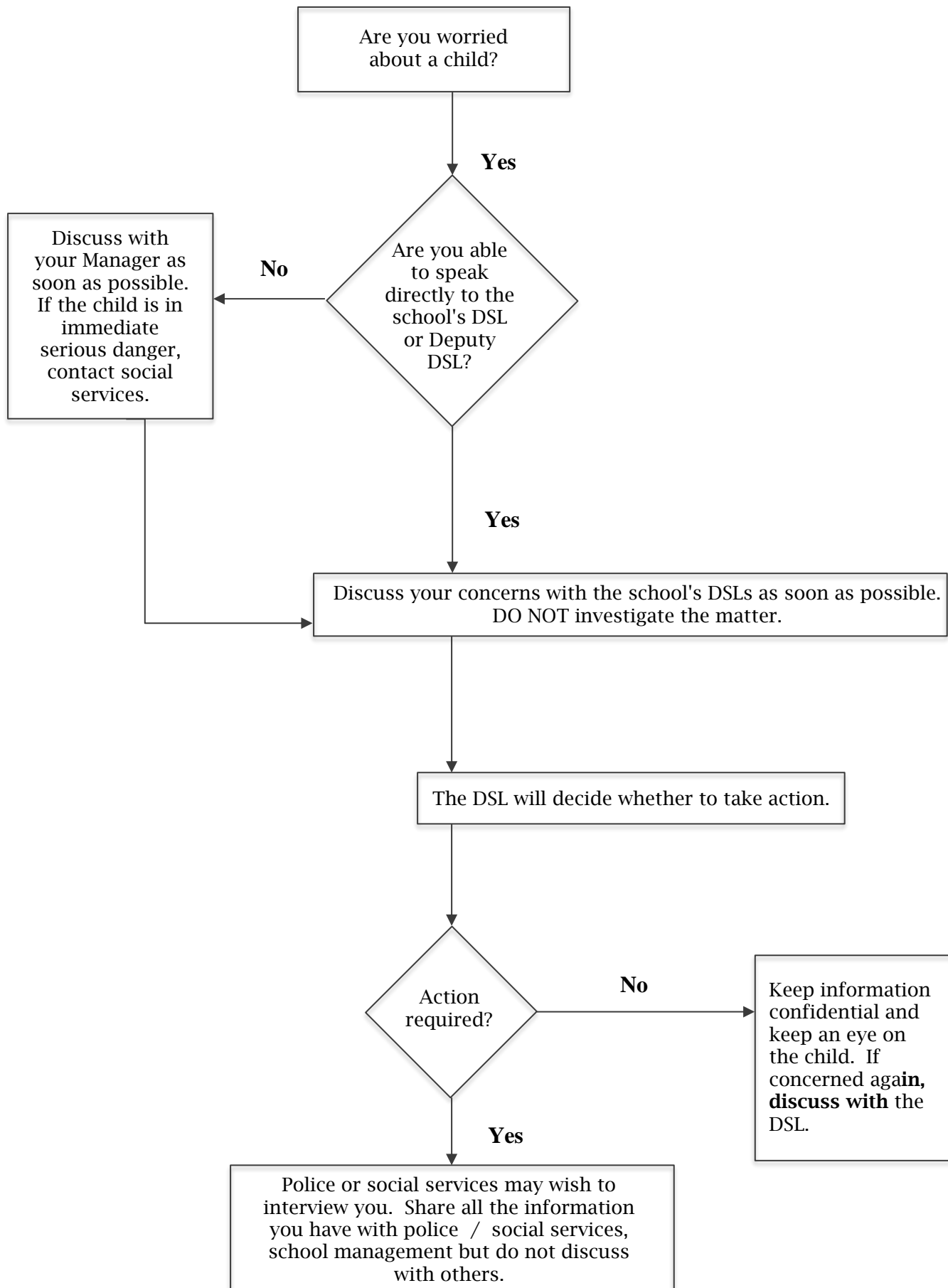
Appendix 2 Further information on the types and signs of abuse

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) and *Report child abuse*.

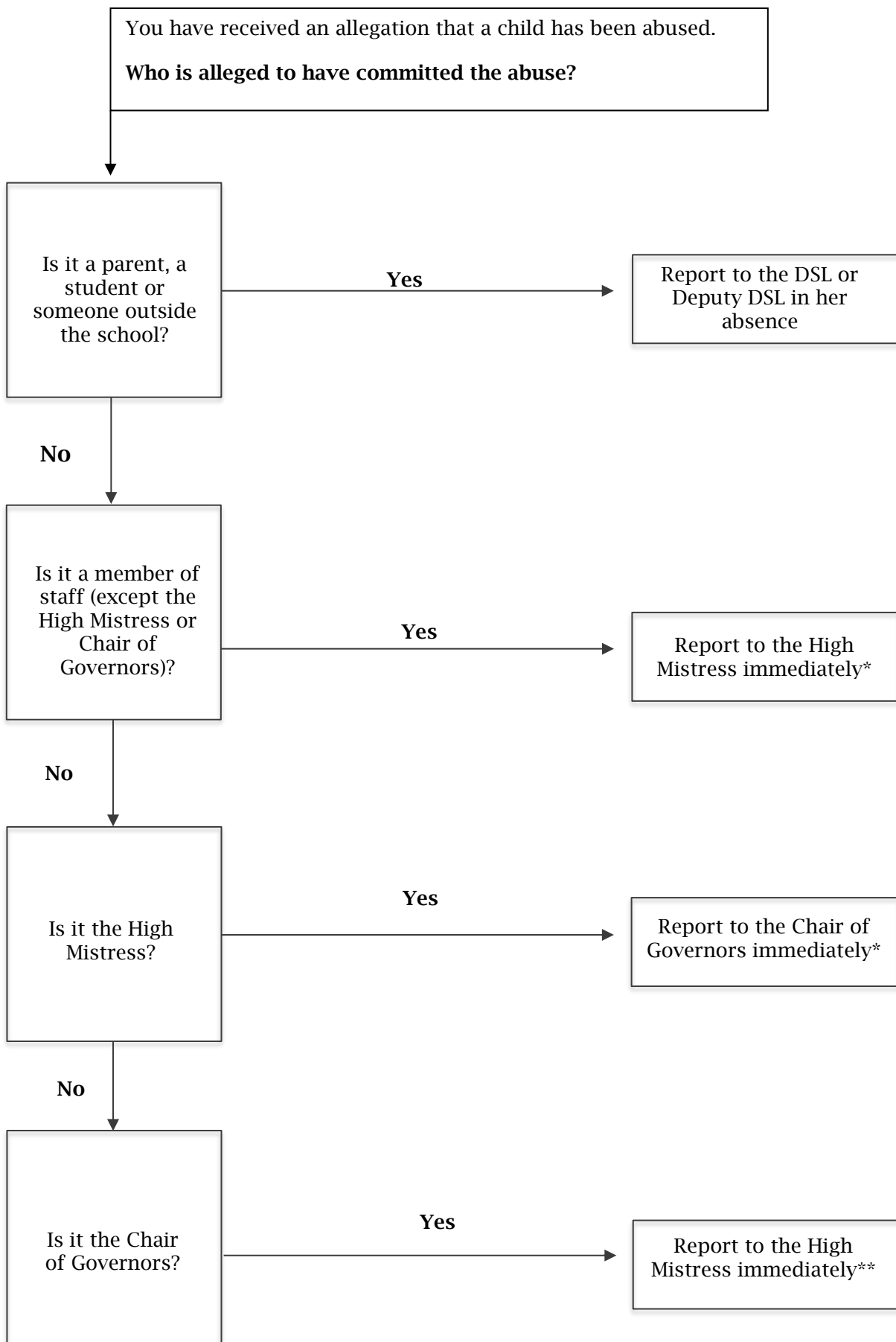
Broad government guidance on the following is also available in Part One *Keeping Children Safe in Education* (September 2024) [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/121212/Keeping-children-safe-in-education-2024.pdf)

- Child who are absent from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Child abduction and community safety incidents
- County Lines
- Children and the Court System – children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children ([5-11-year olds](#)) and [12-17 year olds](#)).
- Children with family members in prison
- Cybercrime
- Bullying including cyberbullying
- Domestic violence/abuse
- Drugs
- Fabricated or induced illness
- Female Genital Mutilation
- 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. A change in law came into force in February 2023 (it is now a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used)
- Homelessness
- Mental health
- Missing children and adults strategy
- Modern Slavery
- Private fostering
- Preventing radicalisation
- Serious Violence
- Sexting
- Sexual violence and sexual harassment between children in schools and colleges
- Relationship abuse
- Trafficking

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



Appendix 4 Allegations flowchart



* The LADO must be contacted.