



ST PAUL'S
GIRLS' SCHOOL

Safeguarding (Child Protection) Policy

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Legal framework

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Working together to improve school attendance
- Schedule to the Education (Independent School Standards) (England) Regulations 2014
- Part 3 and Part 4 of ISI Regulatory Requirements
- Sexual Offences Act 2003
- Online Safety Act 2023
- The Voyeurism (Offences) Act 2019
- Equality Act (2010) (with amendments in force as of 7 July 2025)
- Children Act (1989)
- Children Act (2004)
- Statutory Prevent guidance (England & Wales) (published in 2016 and updated most recently in 2023) issued under Section 29 of the Counter-Terrorism and Security Act 2015
- Statutory FGM guidance (England & Wales) (2020), under Section 5C of the Female Genital Mutilation Act 2003.
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Data (Use and Access) Act 2025 (updated June 2026)

Who this policy applies to

This policy applies to all members of the school's community, including students, parents (current and prospective), 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 or remotely, e.g. online interview.

What this policy is for

This policy aims to:

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

Other relevant school policies

(those in bold with particular priority to Safeguarding and Child Protection).

- Allergy Safety policy
- Child-on-Child Abuse policy
- Mental Health and Wellbeing policy
- Anti-bullying policy
- Behaviour (including rewards and sanctions) policy
- Reporting Low Level Concerns policy
- PSHE including RSE policy
- Staff Code of Conduct
- Educational Visits policy
- Health and Safety and Instruction Notices
- Staff Acceptable Use policy (AUP)
- Student Acceptable Use policy (AUP)
- Learning Support policy
- Attendance Policy including children missing in education and missing student policy
- Mobile Phone policy
- Substance Misuse Management and Education policy
- Searching, Screening and Confiscation policy
- Online Safety policy

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Policy Statement

1.1 All governors of the school hold collective responsibility for ensuring that effective systems are in place to help staff understand and fulfil their safeguarding duties. This safeguarding policy, authorised by the governors, is addressed to all members of the school's community, including students, parents (current and prospective), 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. The policy is published on the school's website and hard copies are available on request. It can also be provided in large print or other accessible formats, if required. This policy applies wherever staff, governors, volunteers, visitors, or parents are engaging with students, including activities taking place off-site—such as school trips or visits to activity centres or online meetings/lessons. Safeguarding and promoting the welfare of children is a shared responsibility and all adults within the school community are expected to play an active role in this duty.

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 2026) as

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the 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
- making action to enable all children to have 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, exploitation and includes child on child abuse (for further information see Section 5 and Appendix 2).

1.4 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 students who are likely to be 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.

1.5 We seek ways to provide opportunities for students to contribute views on safeguarding through regular feedback mechanisms (e.g. surveys, student councils, focus groups and a specific Safeguarding Ambassador role) to inform policy development and practice. Their perspectives and participation are integral to fostering a strong safeguarding culture.

1.6 There is an important distinction to be made 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.

1.7 Interventions for children in need may include CAMHS (Children and Adolescent Mental Health Services); TAC or TAF meetings (Team Around the Child/Family); targeted early help services delivered through Family Help; GP referrals and/or referrals to our school counselling/nurse services.

Principles

2.1 St Paul's Girls' School (the school) is committed to ensuring a child centred and coordinated approach to safeguarding and promotes the welfare of children and young people; it expects **all** governors, staff, volunteers, visitors, and parents to share this commitment. The school recognises that children have a fundamental right to be protected from harm and that students cannot learn effectively unless they feel secure and safe. The school therefore aims to provide an 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 it practices safer recruitment in checking the suitability of staff, governors, contractors 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 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 key staff involved in recruitment and safeguarding, including HR personnel, the Deputy Head (Safeguarding & Inclusion) who is also the DSL (for ease of reference, this role may be referred to interchangeably as either the 'DSL or 'Deputy Head (Safeguarding & Inclusion) within this document), key members of the Senior Leadership Team and some other nominated staff undertake safer recruitment training at least every three years

- ensure that it carries 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
- ensure that, where the school ceases to use the services of any individual (whether employed, contracted, a volunteer or a student) because that person is deemed unsuitable to work with children, a detailed referral is made to the Disclosure and Barring Service (DBS) as soon as possible, and in any case within one month of the individual leaving the school. This includes situations involving dismissal, non-renewal of a fixed-term contract, ceasing to use a supply teacher (whether engaged directly or via an agency), termination of a trainee or volunteer placement, discontinuation of staff provided by a contractor, as well as resignation or voluntary withdrawal from any of the above roles.

The school recognises its legal duty to make a referral where the relevant criteria are met, and acknowledges that failure to do so constitutes a criminal offence

In cases where a dismissal does not meet the threshold for DBS referral, the school will consider whether a referral to the Teaching Regulation Agency (TRA) is appropriate. Grounds for such a referral may include:

- Unacceptable professional conduct
 - Conduct likely to bring the profession into disrepute
 - A conviction, at any time, for a relevant offence
- ensure that, where individuals from another organisation, (including St Paul's School) are working with students off-site, the school has received written confirmation, in the form of a letter of assurance, that appropriate child protection policies and procedures are in place, including enhanced DBS checks, and that these checks have raised no concerns regarding 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](#); The LSCP partnership for Hammersmith & Fulham includes the **Local Authority**: Chief Executive of Hammersmith & Fulham Council, **Integrated Care Board (ICB)**: Chief Executive Officer of the North West London ICB (formerly Clinical Commissioning Group) and Police
- ensure that early help is provided as soon as a concern emerges. The provision of early help does not imply that the concerns are minor; in fact, early help may be required in response to significant issues such as the risk of serious violence (including gang involvement or exploitation through county lines), repeated suspensions or placement in alternative provision, or where a child is part of a family affected by adult mental health difficulties, substance misuse, or domestic abuse. Early help is a form of support available to all children, aimed at improving family resilience and outcomes, and at reducing the likelihood of problems escalating. Providing support at an early stage is more effective in promoting the welfare of children than responding only when issues become more acute.
- The DSL and Deputy Designated Safeguarding Leads (DDSLs) are expected to have a clear understanding of the local early help process, including how and where to access support for children and families
- be particularly alert to the **potential need** for early help for any child who:

-
- is disabled or has specific health conditions and additional needs
 - has special educational needs, whether or not they have a statutory Education, Health and Care Plan (EHCP)
 - has a diagnosed or emerging mental health need
 - is a young carer
 - is pregnant and/or is a parent themselves
 - Is gender questioning
 - has exhibited early signs of abusive, violent and/or harmful behaviours
 - is showing signs of being drawn into anti-social or criminal behaviour, including involvement in gangs and association with organised crime groups, or county lines activity
 - is frequently missing from education, home or care
 - has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, or is currently placed in an Alternative Provision or a Pupil Referral Unit
 - is at risk of exploitation, modern slavery, trafficking, or sexual and/or criminal exploitation
 - is vulnerable to radicalisation or other forms of exploitation
 - has a parent or carer in custody, or is affected by parental offending
 - lives in a family situation that presents challenges, such as parental substance misuse, adult mental health difficulties, or domestic abuse;
 - is themselves misusing alcohol or drugs
 - is at risk of so-called 'honour'-based abuse, including Female Genital Mutilation (FGM) or forced marriage
 - is in a private fostering arrangement.
 - protect each student from any form of abuse, whether from an adult or another student or child
 - be alert to signs of abuse occurring within the school, in the wider community, within families (intra-familial), and outside of the family context (extra-familial), including online, and maintain a professional curiosity and an attitude of 'it could happen here'
 - deal appropriately and promptly with every suspicion or disclosure of concern, harm or abuse and to consider, at all times, what is in the best interests of the child
 - work with external agencies and support students who have been abused in accordance with their agreed child protection plan where these are in place
 - be alert to the social, emotional and health needs of all children and additionally those on the SEND and Medical Health Needs registers
 - 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
 - operate robust and sensible health and safety procedures
 - take all practicable steps to ensure that school premises are as secure as circumstances permit

- understand when it is appropriate to contact the police, and take action in accordance with the 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
- ensure the DSL, Deputy Head (Pastoral) and PSHE and RSE Leads should meet at least termly to review, update 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 (regularly reviewed and updated), and other termly/annual updates.

Child protection procedures – summary

3.1 Every disclosure, concern, or suspicion of abuse, whether arising within or outside the school, will be taken seriously.

3.2 In accordance with published local safeguarding thresholds, such concerns will be referred to the relevant statutory agencies and the school will not undertake any investigation that could compromise a statutory child protection enquiry.

3.3 In such cases, the following referral procedures will apply:

If the allegation is against a member of staff (including supply teachers), the DSL or a volunteer, governor, contractor or other individual associated with the school, the allegation should be reported via CPOMS StaffSafe which is monitored by members of the safeguarding team including the DSL and the High Mistress. Where a concern suggests that a child (or member of staff) may be at immediate risk of harm, the matter should be brought directly to the attention of the High Mistress without delay, or in her absence to the DSL.

The matter will be referred by the High Mistress or the DSL to the Local Authority Designated Officer (LADO) within one working day if it crosses the harm threshold. 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. See appendix 4 flow chart for guidance

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 relates to an external 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, it should be reported to 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. The High Mistress will ensure the matter is reported in CPOMS StaffSafe.

If the allegation does not involve a member of staff or any professional connected to the school, but the child is believed to have suffered harm or is at risk of harm, the DSL will refer the matter to the children’s social care department in the local authority where the child resides. In cases that appear to be borderline, advice or

informal consultation may initially be sought from the Hammersmith and Fulham Initial Contact and Advice Team, on a “no names” basis where appropriate

If the allegation concerns a parent, and the school is aware that the parent is employed in a role that involves working with children, for example, as a teacher, GP, or religious leader, the school must inform the Local Authority Designated Officer (LADO). The DSL may wish to consult with the relevant social work team before doing so, particularly if the case has already been referred and a social worker has been allocated.

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 school undertakes an annual audit of its safeguarding arrangements to evaluate compliance, effectiveness and areas for development. The DSL, Safeguarding Governor, and High Mistress will contribute to and consider the findings of this review, including any recommendations for improvement. To ensure objectivity and provide appropriate challenge, the school may engage an external professional, critical friend or representative from the Local Safeguarding Children Partnership (LSCP) to undertake the review. This process will include consideration of both operational safeguarding practice and the effectiveness of governance oversight.

4.2 The Board will ensure an appropriate senior member of staff, from the senior leadership team (**SLT**), 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 Safeguarding is a whole school responsibility involving all staff, governors, volunteers, contractors. Training and or/briefings are provided so that all are aware of their safeguarding responsibilities when working with children or visiting the school.

4.6 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.

4.7 Where there is a safeguarding concern, the DSL (or other member of the safeguarding team) 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.

4.8 Staff should recognise that young people might not find it easy to talk about their abuse. 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.

4.9 Systems for students to report safeguarding concerns are clearly outlined on the school website, the student portal, and are regularly reinforced through PSHE/RSE lessons, tutorials, and by the Wellbeing Team

and pastoral staff. Students also receive an age-appropriate summary of the policy to support their understanding. Students are made aware that they can speak to any member of staff if they have a safeguarding concern. However, they are also informed that any concern involving risk of harm, or where harm has occurred, will be passed directly to the DSL or one of the DDSLs. While concerns can be raised with any trusted adult, students are encouraged to speak to the DSL or a DDSL in the first instance wherever possible.

4.10 Photographs and contact details of all members of the Safeguarding Team are clearly displayed in every classroom throughout the school. There are multiple routes available for students to report concerns about themselves or others. These include:

- Worry boxes located in different areas of the school
- The anonymous online reporting tool, Whisper
- Monthly safeguarding drop-in sessions, where trained Student Safeguarding Ambassadors are available to listen and signpost support.

4.11 The school prides itself on fostering respectful and trusting relationships between staff and students, and as a result, the Safeguarding and Pastoral teams are accessible and approachable should students wish to talk directly.

4.12 In addition, a safeguarding team structure, including a clear hierarchy of DSL roles and responsibilities, is displayed in the staffroom and relevant staff office areas. This information is also printed on the lanyard cards. All staff are reminded of safeguarding roles and reporting lines annually, or sooner if there is a change in personnel.

4.13 The main responsibilities of the DSL include:

- Clarifying the nature of concerns or disclosures with the person who reported it.
- Referring all cases of suspected abuse or neglect to local authority children's social care, supporting staff who make referrals and ensuring follow-up/escalation as needed
- Liaising with the Channel programme and Prevent if there are concerns a child is at risk of radicalisation
- Referring cases where a crime may have been committed to the police, in line with the NSPCC guidance for schools ("When to Call the Police")
- Notifying the DBS when a person (including staff, volunteers, governors, agency/supply staff or contractors) has been removed from work because they are considered unsuitable to work with children (this will always be alongside the High Mistress and HR)
- Acting as a key point of contact for the three statutory safeguarding partners (local authority, Integrated Care Board/CCG, and chief officer of police), ensuring effective multi-agency coordination
- Providing support, advice and expertise on safeguarding and child protection to governors, staff (including part-time and volunteers), visitors and parents, helping them decide when to make a referral
- Understanding the filtering and monitoring arrangements and the associated safeguarding risks
- Conducting an annual review of online filtering and monitoring systems with the support of the Director of IT and the Digital Strategy Group and maintain evidential records of these.
- Oversee the maintenance of the school's cyber security systems to protect student data.
- Leading on new online risks and emerging technologies with the support of the 'Online Safety Lead'.

- Ensuring that all staff and volunteers, including new and part-time staff, have access to and understand the school's safeguarding policy and procedures
- Coordinating child protection procedures within the school, overseeing record-keeping, referrals, and outcome tracking
- Leading the safeguarding and child protection training programme for staff, governors and volunteers, including induction training and refresher training and ensuring Prevent awareness training is included
- Keeping detailed, accurate and secure written records of all safeguarding concerns, decisions, rationale, and actions, whether referrals were made or not, and ensure confidentiality and secure storage, separate from pupil files
- Ensuring child protection records are securely stored, that required notifications appear on pupil records, and that information is only accessed by those who need it
- Liaising with the LADO and relevant local authority social care team, especially for allegations against staff, parents or other adults working with children
- Keeping parents informed of actions taken under safeguarding procedures as appropriate, in line with policy and engagement protocols
- Informing senior leadership (The High Mistress) of safeguarding matters, particularly ongoing Section 47 enquiries or police investigations
- Monitoring children subject to child protection plans, ensuring plans are current and notifications are acted upon in collaboration with statutory agencies
- Contributing to multi-agency working, including early help and Family Help, ensuring inter-agency plans are followed, and the school plays its role effectively in Working Together statutory arrangements
- Ensuring locally agreed multiagency procedures are adhered to, per the arrangements set out by the Local Safeguarding Partnership
- Advising and acting on all suspicions or concerns that children may need additional support, or are at risk of abuse or neglect, as reported to the DSL
- Attending and contributing to child protection conferences or review meetings, as required, and ensure relevant staff are supported to do so as part of inter-agency planning
- Ensuring receipt and transfer of child protection files when a pupil joins or leaves the school, within five days for in-year or term-start moves, sent separately from the main pupil file, with secure transit and receipt confirmed
- Maintaining records of staff safeguarding training and safer recruitment procedures, ensuring compliance with training schedules and statutory requirements.
- Considering the pupil's wishes, where they have sufficient understanding and maturity, and have been fully informed. In critical situations, following consultation, DSL may need to override these wishes in order to protect the child. However, they will always explain this to the child if doing so
- Considering parental views, provided that doing so does not conflict with the child's welfare. If disclosure to parents would place the child at risk, the DSL will consult trusted professionals before informing parents. A referral to children's social care may be made without prior parental contact
- Observing confidentiality obligations, sharing information only on a need-to-know basis and in line with information-sharing policy.

- Assessing risk involved with all disclosures. When disclosures relate to the sharing of images, they will consider whether the sharing was consensual, whether the child was pressured, were adults involved, was the content harmful, violent or repeated, does the child have known vulnerabilities?

4.14 The DSL or DDSLs 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.

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

The **DSL** is **Sophie McGeoch**, Deputy Head (Safeguarding & Inclusion)/DSL who may be contacted on 020 7605 1118 or 07833 450 893.

If the DSL is unavailable, her duties will be carried out by one of the DDSLs who have received appropriate training.

The DDSLs are:

Kate Renshaw: Deputy Head (Pastoral) - 020 7605 4892

Lauren Speight: Head of Lower School - 020 7605 4893

Jade Ramsay: Head of Middle School - 020 7605 1128

Chloe Lallyett: Head of Lower School - 020 7605 4893

Sydne Derbyshire: (Head of UIV) - 020 7605 4892

Helen Dangerfield: Deputy Head (Senior School) - 020 7605 4817

4.16 The Safeguarding Team (as listed above) are all required to complete Level 3 child protection training and training in inter-agency working and will attend refresher training at two-yearly intervals.

4.17 The DSL has the appropriate authority and has been given the necessary time, funding, training, resources, and support to carry out this role.

Types of abuse

5.1 The definition of child abuse is deliberately broad to encompass all forms of maltreatment that a child may experience. A child may be abused or neglected by the direct infliction of harm, or by the failure to take action to prevent harm. Harm may include not only physical ill treatment, but also emotional abuse and the psychological impact of witnessing the ill treatment of others.

5.2 This is particularly relevant in the context of domestic abuse, where children may see, hear, or otherwise experience its effects, even if not directly targeted. Abuse may occur within a family setting, in institutional or community environments, and may be perpetrated by individuals known to the child or, more rarely, by strangers. Abuse can take place entirely online or technology may be used to facilitate abuse that occurs offline. Children may be abused by adults or by other children.

5.3 There are four main categories of abuse, commonly defined as:

- **physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **emotional abuse** is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying), causing children to feel frightened or in danger frequently, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **sexual abuse** involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape, oral sex or penetration by an object) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it (see section 6 of this policy).
- **neglect** is the persistent failure to meet a child's basic and/or psychological needs, likely to result in 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.

5.3 Additionally, KCSIE references child sexual and criminal exploitation, trafficking, county lines, and the online facilitation of abuse as forms of abuse. Exploitation occurs when a child or young person is manipulated, coerced, or deceived into sexual, criminal, or other activities for the benefit of others. This includes **child sexual exploitation (CSE)**, where children are groomed and exploited sexually; **child criminal exploitation (CCE)**, such as county lines involvement or trafficking; and **other contexts**, including forced labour or radicalisation. Exploitation may be facilitated through technology or online platforms and often overlaps with other forms of abuse and neglect as defined in statutory safeguarding guidance. See section 6 for further information.

5.4 Abuse, neglect, and other 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.

5.5 Safeguarding incidents or concerning behaviours may be linked to factors outside the school environment and can occur between children beyond the school gates. All staff, and particularly the DSL and DDSLs, should consider whether a child may be at risk of abuse or exploitation in contexts beyond their family.

5.6 Extra-familial harm can take many forms, and children may be vulnerable to multiple overlapping risks, including (but not limited to): sexual exploitation, criminal exploitation, serious youth violence, radicalisation, domestic abuse within teenage relationships, and online abuse.

Safeguarding issues

6.1 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, serious violence, criminal exploitation (including that linked to county lines), radicalization, the possession, creation, manipulation or distribution (consensual and non-consensual) intimate media (such as images, videos, live-streaming) including those generated using AI e.g. deepfakes can be signs that children are at risk.

Child-on-child abuse (including harassment and violence)

6.2 All staff should be aware that children can abuse other children and that it can happen both inside and outside of school. The school adopts a zero-tolerance approach to any form of child-on-child abuse, and all staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator and they should be familiar with the school's separate child-on-child abuse policy. Child-on-child abuse should never be minimised or overlooked.

6.3 As well as knowing how to respond to concerns, all staff should know that child-on-child abuse is preventable. As well as knowing the types of child-on-child abuse, how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence themselves.

6.4 It is crucial to acknowledge that the absence of reported cases does not mean abuse is not occurring; rather, it may simply remain unreported. Therefore, if staff have any concerns regarding child-on-child abuse, they should report these immediately to DSL or DDSL in line with the school's Child-on-Child Abuse policy.

6.5 In accordance with KCSIE, this school classifies bullying (including cyberbullying, prejudice-based bullying, and discriminatory harassment) as a core subtype of child-on-child abuse. Bullying is a safeguarding matter and must never be downplayed as a normal part of growing up, 'banter', or a harmless 'rite of passage'.

6.5.1 While peer conflicts vary in severity, repeated or targeted victimisation triggers a formal safeguarding assessment. If the DSL suspects a pupil is suffering, or is likely to suffer, significant harm from peer victimisation, a formal referral will be made immediately to Children's Social Care under Section 47 of the Children Act 1989.

6.5.2 Cyberbullying carries no physical boundaries and will be treated with equal severity to offline abuse. This explicitly includes the malicious creation, manipulation, or distribution of AI-generated deepfakes or photorealistic altered imagery used to humiliate or abuse a peer.

6.5.3 In line with Working Together, any child-on-child abuse motivated by prejudice against race, religion, disability, SEND, sex or sexual orientation is treated as an aggravated safeguarding concern. The DSL will systematically track these incidents to disrupt patterns of discriminatory behaviour within the student body.

Child on child sexual violence and sexual harassment

6.6 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 (including where the online element facilitates, threatens and/or encourages sexual violence) and face to face (both physically and verbally) and are never acceptable.

6.7 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 should never be dismissed as 'banter'. 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.

6.8 It is important to note that the term 'victim' is used in accordance with DfE guidance but staff should use the terminology preferred by the child.

6.9 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.

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

6.10 CSE and CCE are both recognised forms of abuse. In both cases, an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. While age is often the most apparent factor in this imbalance, it may also arise from differences in gender, sexual identity, cognitive ability, physical strength, status, or access to economic or other resources. In some instances, the abuse occurs in exchange for something the child needs or desires, and/or for the financial gain or enhanced status of the perpetrator or facilitator. It can affect children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery and as such a referral should be completed where a potential victim of CCE or CSE is identified.

6.11 Exploitation can be carried out by individuals or groups, by males or females, and by adults or other children. It may involve a one-off incident or a prolonged pattern of abuse, ranging from opportunistic acts to complex, organised exploitation. Compliance may be secured through force and/or enticement, with or without accompanying violence or threats. Importantly, a child may be exploited even when the activity appears consensual, and exploitation may be physical or facilitated entirely online.

6.12 Children subjected to **CCE** often commit offences themselves, and their status as victims is frequently overlooked, particularly in the case of older children. However, even if a child appears to have agreed or consented to the activity, they may still have been criminally exploited and have become trapped. It is also important to recognise that girls may experience criminal exploitation differently to boys; the indicators may be less obvious, but the risk remains. Furthermore, both boys and girls who are criminally exploited may also be at increased risk of sexual exploitation.

6.13 **CSE** is a form of sexual abuse and can affect any child, including those aged 16 or 17 who may legally consent to sexual activity. A child may not always realise that they are being exploited, for example, they may believe they are in a genuine romantic relationship.

Gangs and serious youth violence

6.14 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.

Upskirting

6.16 Upskirting and down-blousing is a criminal offence under Section 67A of the Sexual Offences Act 2003, amended by the Voyeurism (Offences) Act 2019. It is recognised as a sexual offence and is considered a form of sexual harassment and potentially child-on-child abuse. Related online sexual offences, including cyberflashing, are also covered by the Sexual Offences Act 2003. Upskirting is defined as recording an image or video beneath a person's clothing, without their knowledge or consent, for the purpose of sexual gratification, or to cause humiliation, alarm, or distress. Anyone, regardless of sex or gender, can be a victim. As a sexual offence, a conviction may result in an offender being subject to sex offender notification requirements, and victims are entitled to lifelong anonymity under the Sexual Offences (Amendment) Act 1992.

Domestic abuse

6.17 The cross-government statutory definition of domestic abuse, as established under the Domestic Abuse Act 2021, applies to individuals aged 16 or over who are personally connected, such as intimate partners (current or former) or family members, and includes a range of abusive behaviours, whether experienced as a single incident or a pattern over time

6.18 These behaviours may be psychological, physical, sexual, emotional or financial, and also include controlling or coercive actions.

6.19 Children who see, hear, or experience the effects of domestic abuse at home are recognised as victims in their own right under the 2021 Act, regardless of whether the abuse was directed at them. Exposure to domestic abuse can cause serious, long-lasting emotional and psychological harm, leading to self-blame, displacement from the family home, and difficulties in learning and development. Section 20 of the Victims and Prisoners Act 2024 introduced a new provision into Part 3 of the Domestic Abuse Act 2021 under Section 49A, placing a statutory duty on police forces across England and Wales to notify a child's educational setting if they have reasonable grounds to believe a child may be a victim of domestic abuse. This duty applies to all children connected to the household where police attended a domestic abuse incident, including those not physically present. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

6.20 Domestic abuse affecting young people may also manifest within their own intimate relationships, outside the family context. All of these experiences, whether witnessed at home or lived through personally, can adversely affect a child's mental health, wellbeing, growth, and educational progress.

Mental health

6.21 All staff must recognise that mental health problems can, in some cases, indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation (KCSIE).

6.22 Although only appropriately trained professionals should make formal diagnoses; education staff are well placed to observe pupils' day-to-day behaviour and identify those showing possible signs of mental health issues or risk of developing them.

6.23 If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like, and
- Physical signs of self-harm or neglecting themselves.

6.24 Where a child has experienced abuse, neglect, exploitation, or traumatic adverse childhood experiences, such experiences may have long-term effects on their mental health, behaviour and learning, continuing into adolescence and adulthood. All staff should understand how such experiences can adversely affect these areas.

6.25 If staff have a mental health concern that is also a safeguarding concern, they must take immediate action following the school's child protection procedures and speaking directly to the DSL or a DDSL. If staff feel that a child is in immediate danger, they should call 999 or take them to A&E immediately. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option. All staff will find it helpful to refer to the DfE guidance "Mental health and behaviour in schools" (2018) as a complement to KCSIE in understanding how schools can support pupils' mental wellbeing effectively.

Serious violence

6.26 Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing the intent to do so) to the DSL or DDSL who will assess the risk and take appropriate action. Staff should also be aware of the school's student search and confiscation policy.

6.27 Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions etc.) or a history of offending. Early, evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring and therapeutic support.

Further information on the types and signs of abuse

6.28 Further guidance and practical support are available via the following trusted sources:

- NSPCC website – comprehensive explanations of abuse types, indicators, and safeguarding steps
- DfE's "What to do if you're worried a child is being abused" (2015, still current)
- KCSIE Part One.

Safeguarding issues staff should be aware of

6.29 This list reflects the most current statutory guidance and includes those which are outlined in more detail above:

- Child-on-child abuse
- Online safety and harms
- Children requiring mental health support
- Children absent from education
- Children missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE) including County Lines
- Child abduction and community safety incidents
- Court-related matters e.g. children called to testify in criminal proceedings
- Children with family members in prison
- Online safety
- Cybercrime and online exploitation
- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Domestic abuse between family members or peers
- Substance misuse (drugs and alcohol)
- Fabricated or induced illness
- Faith-based abuse
- Gender-based violence/Violence Against Women and Girls
- Hate incidents and crimes
- So-called honour-based Abuse (including Female Genital Mutilation FGM and Forced Marriage)
- Homelessness
- Mental health concerns
- Modern slavery and human trafficking
- Preventing radicalisation
- Serious violence (including knife crime)
- Nude and semi-nude image sharing
- Sexual violence and sexual harassment between children
- Upskirting and down-blousing
- Relationship abuse (adolescent intimate partner violence)
- Private fostering arrangements

6.30 KCSIE emphasises that safeguarding concerns are rarely isolated. Children may experience multiple, overlapping forms of harm, both online and offline. Staff must exercise professional curiosity, understand how

risks manifest across contexts, and know how to respond appropriately. The above list comprises all the named issues KCSIE expects staff to recognise and respond to.

Signs of abuse

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

- the student says she has been abused or asks a question which gives rise to that inference
- there is no reasonable or consistent explanation for a student's injury (including cuts, bruises, burns)
- the injury is unusual in kind or location; there have been a number of injuries; there is a
- pattern to the injuries
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the student's behaviour. For example, they may become aggressive, challenging, disruptive, withdrawn, or clingy
- the student does not want to change clothes in front of others or participate in physical activities
- the student is having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- the student talks about being left home alone, with carers that appear to be inappropriate or with strangers
- the student has poor school attendance or punctuality
- the student 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 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 is having mental health difficulties
- 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
- the student is missing from home or care or talks about running away
- parents or carers blame their problems on their child
- parents who fail to seek medical treatment when their child is ill or injured
- the student fabricates or induces illness.

7.2 Signs of grooming, sexual exploitation, sexual abuse, criminal or online exploitation 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.

7.3 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.

7.4 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 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).

Preventing Radicalisation

8.1 Radicalisation is the process by which an individual comes to support terrorism or forms of extremism associated with terrorist ideologies.

8.2 Extremism is defined in government guidance as “vocal or active opposition to fundamental British values”, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This definition also encompasses calls for the death of members of the armed forces.

8.3 Terrorism involves acts or threats designed to cause serious violence, damage, or disruption with the intention of influencing government or intimidating the public, often to advance a political, religious or ideological cause.

8.4 Under the Prevent Duty, all staff have a legal obligation to “have due regard to the need to prevent people from being drawn into terrorism”. This statutory duty applies to all schools and is embedded in the school's safeguarding responsibilities. Staff must be able to recognise indicators of vulnerability to radicalisation and know how to report concerns.

Signs of Radicalisation

8.5 There is no single indicator of radicalisation. A combination of factors may contribute to a child's vulnerability, including social isolation, exposure to radical ideologies online or through peers, and unmet personal or emotional needs. Extremist groups often exploit these factors by offering identity, belonging, or purpose. Online platforms and social media continue to be significant tools in radicalisation, especially among young people.

8.6 Possible signs of radicalisation may include:

- Withdrawal or isolation from family and friends
- Expressing views that appear scripted or rehearsed
- Unwillingness or inability to discuss their views
- Sudden disrespectful or intolerant attitudes towards others
- Increased anger, agitation or emotional volatility
- Heightened secrecy around internet or phone use

8.7 Children at risk of radicalisation may also display low self-esteem, or may have been victims of bullying, abuse, or discrimination.

Safeguarding response

8.8 As with all safeguarding concerns, staff must be vigilant to changes in a child's behaviour and use their professional judgement to determine whether a child may be at risk. Any concerns about a child potentially being radicalised must be discussed with the DSL or DDSL. The DSL may make a referral to the Channel programme, which provides early intervention for individuals identified as vulnerable to being drawn into terrorism. Where appropriate, a referral may also be made to children's social care.

Risk assessment

8.9 In accordance with the Prevent Duty, the school has carried out a risk assessment to identify the potential risk of pupils being drawn into terrorism or exposed to extremist ideologies. This assessment is regularly reviewed by Governors in light of emerging risks, local intelligence, and external guidance.

Working in partnership

8.10 The school works in partnership with local safeguarding agencies and has established clear lines of communication with the Local Safeguarding Children Partnership (LSCP) and the Local Authority Designated Officer (LADO) in Hammersmith and Fulham. The DSL maintains regular contact with statutory partners to ensure concerns related to radicalisation are addressed collaboratively and effectively.

Staff training

8.11 All staff have completed the DfE's official online Prevent duty training, which is refreshed every two years. In addition, the DSL and DDSLs have undertaken enhanced Prevent training and are therefore equipped to provide support, guidance and advice to colleagues on issues related to radicalisation and extremism. In line with statutory requirements, all staff and governors receive training on the Prevent Duty as part of their safeguarding induction and ongoing continuing professional development (CPD).

IT

8.12 Suitable filtering and monitoring systems are implemented, and their effectiveness is reviewed annually by governors to keep students safe from terrorist and extremist material when accessing the internet in school. These annual reviews are recorded.

How to make a referral

8.13 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.

8.14 Every borough uses different contact methods. The Prevent team covering Hammersmith & Fulham (also serving Kensington & Chelsea) provides advice, training, and referral support. Contact Prevent Team: Telephone: 020 8753 5727 or Email: prevent@lbhf.gov.uk

Children potentially at greater risk of harm

Children with a Social Worker (Child in Need and Child Protection Plans)

9.1 Children may require a social worker if they have safeguarding or welfare needs. Those with Child in Need (CIN) or Child Protection (CP) plans will have an allocated social worker. The school recognises that adverse experiences such as abuse, neglect, or trauma can make these children vulnerable to further harm and may create barriers to attendance, learning, behaviour and mental health.

9.2 Local authorities are required to share information about where a child has a social worker. The DSL will use this information as routine to make decisions in the best interests of the child's safety, welfare and educational outcomes.

9.3 The DSL should use the knowledge that a child has a social worker to inform safeguarding and pastoral responses, such as being alert to repeated unauthorised absence or missing education, and to tailor welfare support, for example through pastoral or academic interventions.

9.4 Such information may be shared with other members of staff such as Attendance Officer, Head of Year. This is at the discretion of the DSL. Any information shared will be strictly confidential and updated regularly.

Children with Special Educational Needs and Disabilities (SEND)

9.5 Children with SEND may face additional safeguarding challenges. As stated in KCSIE, assumptions can be made that indicators of abuse, such as changes in behaviour, mood, or injury, are a result of their disability. Other barriers include social isolation, disproportionate impact of bullying, and communication difficulties. The DSL must ensure tailored support, including helping children to develop safety and online resilience skills. These adaptations are vital for vulnerable children to understand and exercise autonomy in safeguarding contexts.

Children who are LGBTQ+

9.6 LGBTQ+ status is not a risk factor for harm. However, LGBTQ+ pupils or those perceived to be LGBTQ+ may face an increased risk of bullying, marginalisation or abuse, both in and out of school. Vulnerability is often heightened where pupils lack access to a trusted adult or a safe and supportive environment in which they feel able to speak openly. When supporting a gender questioning child, the school will not initiate any action. It will take time to understand the thoughts and feelings of children who are questioning their gender and be appropriately professionally curious about the full range of the child's experiences. Staff should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. The school will ensure parental involvement (unless there is a safeguarding concern that means this will not be in the best interests of the child); the school's Gender Questioning policy should be read by staff.

9.7 The school is committed to reducing these barriers by fostering a culture that is inclusive, respectful, and trusting, where difference is not only accepted but actively valued. Students are encouraged to report concerns, including name-calling, discriminatory language, or bullying of any kind, through safe and confidential routes such as the Whisper reporting system or by speaking directly to trusted staff members. Support is further enhanced by the presence of visible role models, including both staff and trained student

ambassadors, and through partnerships with external organisations such as People Change Minds, which provide additional opportunities for pupils to talk, share experiences and access guidance.

9.8 The school also runs a Spectrum Society, which offers a safe space for students to explore identity and community. In addition, the RSHE and PSHE curriculum explicitly addresses homophobic, biphobic and transphobic language and behaviour, in line with statutory RSHE guidance and safeguarding expectations set out in KCSIE.

Elective home education (EHE)

9.9 While many children thrive under home education, some may become less visible to safeguarding partners. If parents express their intention to remove a child from school to educate at home, the school must work with the local authority to hold a meeting with parents/carers where possible. This ensures that decisions made are in the child's best interests and appropriate support is considered. Once the decision has been made to home educate the school and the parents must inform the local authority and complete the necessary paperwork before removing the student from roll.

Private fostering

9.10 Private fostering occurs when a child under 16 (or under 18 for disabled children) is cared for by someone who is not their parent, legal guardian or close relative. The school recognises its duty to notify the local authority whenever such arrangements come to its attention and are not arranged through the school, allowing the authority to ensure safety and suitability of the care arrangement.

Children who are absent from education

9.11 Children 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 including neglect, child sexual and child criminal exploitation – particularly county lines. The school's response to persistently absent pupils and children missing education (CME) supports identifying such abuse and helps prevent the risk of them becoming a child missing in education in the future.

Children with allergies

9.12 Under KCSIE 2026, children with allergies are at greater risk if a medical incident highlights potential neglect, abuse or exploitation. A child with a severe allergy may be at higher risk of serious harm if their condition is not managed properly. A safeguarding referral is needed if a child is repeatedly sent to school without essential life-saving medication, or if medical details are intentionally withheld. Whilst an isolated administrative error is not a safeguarding matter, failing to provide essential medication or information puts a child at risk.

Children whose data has been leaked following a cyber attack

9.13 A cyber-attack threatens student wellbeing by exposing private records to identity theft, stopping vital mental health support, and increasing the risk of cyberbullying. It also causes severe anxiety due to lost coursework and disrupts the safe digital tools students rely on to report their concerns. The school recognises that technology disruptions are not just IT issues, but major safeguarding risks.

Online Safety

10.1 Online safety is an integral element of staff induction and is regularly reinforced through staff briefings and staff meetings. It is also embedded within the PSHE/RSHE curriculum, ensuring that students receive tailored education on healthy relationships, consent, body confidence and online risks.

10.2 In accordance with KCSIE, the school safeguarding strategy categorises online risks into the following four areas, often referred to as the **4Cs**:

- **Content:** exposure to illegal, inappropriate or harmful material (including misinformation, disinformation and conspiracy theories)
- **Contact:** harmful interactions with others online or with generative AI applications that simulate this e.g. peer-to-peer pressure, commercial advertising and adults posing as young children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; e.g. making, sending and receiving explicit images. This will include consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated by AI e.g. deepfakes, sharing other explicit images and online bullying
- **Commerce:** exposure to online financial risks, inappropriate advertising, scams or gambling.

10.3 The DSL holds strategic responsibility for online safety (including live streaming), with support from the Online Safety Lead and Data Protection Officer. Together with the IT team and Online Safety Officer, they manage filtering, monitoring, information security and access and systems, ensure these meet the DfE's 2026 technical standards, and work collaboratively to identify, record and address incidents. The safeguarding governor reviews these systems and related incidents annually as part of the school's safeguarding audit. In line with KCSIE, the school have a named Online Safety Governor as outlined in Section 21 of this document.

10.4 The DSL and the Director of IT (with other staff as required) meet and periodically reviews the DfE filtering and monitoring standards, ensuring systems remain effective, age-appropriate and proportionate. Staff are trained to understand monitoring logs, escalate concerns as they arise, and maintain familiarity with relevant policies, including the Staff and Student Acceptable Use Policies (AUPs) and the Online Safety policy.

10.5 The school, through its Generative AI policy ensure that only AI products meeting the DfE's Generative AI policy safety expectations are used.

10.6 SPGS is a mobile-phone-free school by default during the school day. This applies to all smart, wearable and/or connected devices capable of messaging, notifications, internet access, audio or video recording, connecting to other devices or networks (exceptions may apply where the device is permitted as a reasonable adjustment for a disability or other health need). The school's Mobile Phone policy applies. Senior School students are permitted to use mobile phones only within the Senior School common rooms that are not visible to younger students; personal devices must only be connected via the school's secure WiFi using school credentials. Students are issued with school laptops (MIV – VI) and are not permitted to use their own devices (such as an iPad) in school time. Students may **not** use personal devices to record or photograph others. Breaching these rules may result in device confiscation, revocation of permissions, or further disciplinary action in line with the Behaviour Policy.

10.7 Online safety considerations also inform broader school practice. This includes curriculum planning (the school ensures that its PSHE policy including RSHE covers the increasing prevalence of fake social media accounts, AI generated sexual imagery including 'deepfakes' and cover new content in relation to sexism and misogyny), staff training, policy development, parental engagement, and DSL responsibilities. All staff are reminded annually, and upon updates to personnel, about their role in upholding online safety measures.

10.8 The school recognises that children may be harmed through the creation, sharing or possession of nude, semi-nude, manipulated or AI-generated intimate images and videos. AI technologies can be used to create realistic sexual images of children, including by altering existing photographs or generating entirely synthetic content. Such material is illegal and can cause significant harm, regardless of how it was created. Incidents

should be treated first and foremost as safeguarding matters, with the welfare of the child being the primary consideration.

10.9 Staff must not view, copy, save, share or delete any image, nor ask a child to do so. If an image has been viewed unintentionally, staff should record what happened and inform the DSL immediately. Staff should provide reassurance, avoid blame or judgement, and explain that the matter must be reported so appropriate support can be provided.

10.10 The DSL will assess the circumstances, determine whether referral to external agencies is required, and ensure the matter is managed in accordance with current UKCIS, NPCC and statutory safeguarding guidance. If no referral is required, the child may be asked to delete the images from their device. Staff must record the child's confirmation. Refusal to delete may be treated as a serious disciplinary issue and may lead to escalation.

10.11 Further details on technology use, mobile devices and prohibited behaviours are found in the school's Acceptable Use and standalone Online Safety and Use of Generative AI policies.

Responsibility of all staff, governors, and volunteers

11.1 All staff, governors, and volunteers at the school have a shared legal duty to safeguard and promote the welfare of pupils. Everyone in these roles must:

- Understand their responsibility to provide a safe environment in which children can learn.
- Protect children from abuse and neglect, recognising that safeguarding responsibility applies equally to all adults connected to the school.
- Be familiar with and follow the school's safeguarding and child protection procedures, including the reporting routes to the DSL.
- Identify welfare concerns or pupils who may require additional support, including those who may benefit from Early Help, Family Help, mental health support, or intervention to reduce vulnerability to abuse, exploitation, radicalisation, criminality, or other safeguarding risks. Staff should be particularly alert to children with SEND, or health conditions, young carers, young parents, those at risk of gang involvement, county lines or other criminal exploitation. Early identification and intervention are essential to prevent concerns from escalating and to secure support at the earliest opportunity.
- Know how to access and implement safeguarding procedures independently, if necessary, including making a referral in the absence of immediate line management.
- Report any safeguarding concerns, including any concerns about staff behaviour, promptly and securely using the school's recording system (e.g. CPOMS). Where CPOMS is unavailable, staff must ensure that paper records are securely forwarded to the DSL and later uploaded; paper forms are readily available from the front office.
- Be aware of the potential safeguarding risks associated with technology use (including the use of AI), including child sexual exploitation, radicalisation, and online harm. Staff must adhere to the Staff Code of Conduct, Acceptable Use Policy, and Anti-Bullying Policy in all digital communications and practice.
- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Understand that preventing the impairment of children's mental and physical health or development forms part of safeguarding and promoting the welfare of children.

- Ensure that allergy safety is treated as a whole-school safeguarding and welfare matter, not only as a first aid matter.

Training

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

11.3 All staff are trained to manage a report of child-on-child sexual violence and sexual harassment. All new governors, 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 the prevailing DfE's *Keeping Children Safe in Education*) of which all staff must read in full Part One: Safeguarding information for all staff. All staff and governors must read this each time it is updated.

11.4 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.

Whistleblowing and Low-Level Concerns

11.5 All staff are required to report via CPOMS StaffSafe (or be brought directly to the DSL and/or the High Mistress if a child is at immediate risk of harm) 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.

11.6 The school is committed to maintaining a culture of transparency and high professional standards. To support this, staff must understand the difference between whistleblowing and low-level concern reporting and follow the correct process for each; these are two separate but complementary safeguarding procedures, both essential for maintaining a safe environment

11.7 **Whistleblowing** (see the school's Whistleblowing policy) relates to reporting serious concerns about unsafe or unethical practices in the school, including allegations of abuse, misconduct, or failures in safeguarding procedures. This includes concerns about a colleague's behaviour that may pose a serious risk of harm to pupils, or broader concerns about systemic failings, such as poor safeguarding culture or repeated procedural breaches. For example, a whistleblowing concern might involve witnessing a staff member using excessive force when managing behaviour or knowingly ignoring a safeguarding procedure.

11.9 **Low-level concern reporting** (see the school's Reporting low-level concerns policy) refers to behaviours by staff or volunteers that do not meet the threshold of harm or for referral to the LADO, but nonetheless raise questions about a person's conduct, professionalism, or adherence to the professional standards or Staff Code of Conduct. A low-level concern might include over-familiar language, breaches of professional boundaries, favouritism, taking photographs of students on mobile phones, or discomfort caused to pupils or colleagues even if unintended. For example, a low-level concern could involve noticing a colleague regularly having private, unsupervised conversations with a pupil in a way that appears overly informal or may be misinterpreted.

11.10 Any concern regarding a serious safeguarding risk, systemic issue or allegation of abuse, (whether this constitutes whistleblowing or a low-level concern) against a member of staff should be reported promptly through StaffSafe in accordance with the school's safeguarding and whistleblowing procedures. These records must include:

- The details of the concern
- The context in which the concern arose
- Details of any actions which have already been taken in response (note that it is not the responsibility of staff to investigate, resolve, or determine the outcome of a situation. Their role is to observe, record, and report concerns. Any investigation or further action will be undertaken by the Designated Safeguarding Lead (DSL), the High Mistress, or the Head of HR, as appropriate).
- The name of the individual reporting the concern (unless raised anonymously)

11.11 Reports will be triaged and considered by the Head of HR, the DSL and the High Mistress, who will determine the next steps. Where a concern suggests that a child (or member of staff) may be at immediate risk of harm, the matter should be brought directly to the attention of the High Mistress without delay. In her absence the DSL. For all cases involving the LADO, the High Mistress will be the school's primary point of contact with the LADO. The LADO will report to and liaise directly with the High Mistress, unless the High Mistress formally delegates this responsibility to another appropriate member of staff.

11.12 Any concern relating to the conduct of the High Mistress should be reported to the Chair of Governors.

11.13 Where necessary, the High Mistress or a delegated senior member of staff should gather as much information as possible by speaking to the individual raising the concern (unless raised anonymously), the member of staff involved, and any witnesses.

11.14 If the concern is raised anonymously, that wish should be respected as far as reasonably possible. However, anonymity cannot be guaranteed in all cases (e.g. if required for fairness in disciplinary processes).

What staff should do if they have concerns about a child or receive a disclosure or allegation of abuse

12.1 Staff are advised to maintain an attitude of “it could happen here” in all safeguarding matters. Whenever staff have concerns about a child's welfare, they must always act in the best interests of the child.

Concerns / initial complaint of abuse

12.2 When a child discloses abuse or a staff member has a safeguarding concern, they must:

- Act immediately.
- Stay calm and sympathetic, listen carefully and maintain an open, non-judgmental demeanour.
- Not judge or decide whether the abuse has occurred.
- Not ask leading questions; instead use open questions like, “Is there anything else you'd like to tell me?” (Tell me, Explain, Describe)
- Reassure the child that they are being taken seriously, but do not promise absolute confidentiality. Explain the need to pass the information to a member of staff to ensure appropriate action. 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 detailed record using the child's own words where possible, including the date, time, place, and context of the conversation, what was said or done by whom, to whom and in whose presence. Sign the record, using full names, and secure it according to policy. Enter it directly into CPOMS, or if inaccessible, securely hand it to the DSL urgently.
- Seek the DSL or a deputy in person immediately if the concern is urgent.
- Take no further action unless instructed by the DSL or the High Mistress.

- Only share information on a need-to-know basis. Refer to the information-sharing section for guidance.

Differentiating types of concern

12.3 All staff receive Level 2 training on distinguishing between low-level concerns and threshold-level allegations and accessing the relevant policy. Staff are informed of the distinction between:

- A concern about a child's welfare (Section 17 of the Children Act 1989: Child in Need), and
- Situations where a child is in immediate danger or at risk of significant harm (Section 47: Child Protection).

12.4 For Child in Need concerns, staff should discuss with the DSL; if appropriate, referrals to Children's Social Care may be made, with notification given to the DSL. If the child is in imminent danger, a staff member may refer directly to Children's Social Care or the Police, informing the DSL at the earliest opportunity. If staff feel that a child is in immediate danger, they should call 999 or take them to A&E immediately. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Why separation of concerns matters

12.5 Separation of concerns matters as:

- KCSIE reflects that schools must manage both threshold-level allegations and low-level concerns with appropriate processes
- Clear definitions of the two and distinct procedures support transparency and trust
- Addressing low-level concerns early and promptly helps prevent escalation and reinforces professional boundaries within the school

Types of referral the DSL may make

12.6 Depending on the nature and severity of the concern or disclosure, the DSL will take one of several actions:

- Immediate referral to children's social care and/or police: if a child is suffering or at risk of significant harm, or the disclosure suggests a criminal offence. The DSL may consult with the LADO or the Hammersmith & Fulham Initial Contact and Advice Team if threshold is unclear, without identifying the family
- Referral for early help or pastoral support: where a child is not in immediate danger but may benefit from multi-agency or school-based intervention (e.g. early help, Family Help, or developmental support). The DSL should refer to children's services
- Time-sensitive actions: DSL must act promptly. If a telephone referral is made initially, it must be confirmed in writing within 24 hours. If no acknowledgement is received within 3 working days, the DSL must make further contact
- Mental health concerns: If a child presents risk to themselves but not from external abuse, DSL follows the school's mental health and wellbeing procedures. Parental consent is typically sought; referrals may involve NHS CAMHS or private mental health professionals. If they feel that a child is in immediate danger, they should call 999 or take them to A&E immediately. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

- Radicalisation concerns: follow the above safeguarding and referral procedures, and if needed, refer to the Channel programme via Prevent
- No parental consent needed: Any adult (staff member, governor, volunteer) may make a safeguarding referral without parental approval
- Contextual safeguarding: referrals should include detailed information about risks from external settings (e.g. online exploitation, peer networks), enabling a full multi-context risk assessment by statutory agencies
- Sibling and extra-familial risk: DSL must consider risks both within and outside the family home and ensure that any necessary support is provided to siblings of the identified child. This may include contacting the DSL at the school where the sibling is educated.

Multi-Agency working

12.7 The school works collaboratively with external agencies as outlined in *Working Together to Safeguard Children*. This involves:

- Contributing to multi-agency plans for children under protection or child in need status
- Recognising that safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. Setting out how they will work together as relevant agencies
- Working with local authority children's social care, the police, health services and other services to promote the welfare of children and protect them from harm
- Facilitating access to pupils by children's social care or other agencies in support of investigations or support planning
- Supplying information to the LSP as required by the Children Act 2004 for safeguarding purposes.

12.27 The DSL leads engagement in these arrangements, ensuring timely, accurate, and child-centred multi-agency working in every case.

Data protection & information sharing

13.1 The school holds personal information about students to safeguard and promote their welfare, advance the school's objectives, support efficient operation, and meet its legal obligations. All such information is processed in compliance with the Data Protection Act 2018 and UK GDPR

Role of the Data Protection Officer

13.2 The school's Data Protection Officer (DPO) is Catherine Lloyd, who, alongside other members of the Digital Strategy Group (DSG) committee, is responsible for:

- Advising staff on data protection obligations
- Developing and updating data policies and procedures
- Monitoring access to personal data
- Responding to data protection inquiries and subject access requests
- Supporting data protection impact assessments
- Liaising with the Information Commissioner's Office (ICO) and reporting to the Governing Board

Access to personal information

13.3 Students and, where applicable, their parents, have the legal right to request access to personal data held by the school under UK GDPR and the DPA 2018. Some exemptions may apply, particularly in safeguarding contexts. Any request must be considered carefully, and where possible, advice sought from the DPO or relevant welfare agencies prior to disclosure. However, safeguarding is paramount and so seeking such advice should not delay any safeguarding concerns being raised or looked into.

Sharing for safeguarding purposes

13.4 While the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 place legal obligations on personal data processing, they do not prevent or restrict the sharing of information necessary for safeguarding children. KCSIE makes clear that safeguarding needs must always take precedence over data protection concerns.

13.5 When considering sharing information, the child's welfare must be paramount. Information sharing is critical for identifying and tackling abuse, neglect, and exploitation, and for promoting educational and welfare outcomes. The school will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children. Records shared for these purposes often include special category data and must be handled securely and confidentially. Ordinarily, before any information is shared, staff should seek advice and instruction from the DPO; the seeking of such advice should not impede ensuring the safeguarding and welfare of the child.

Student child protection records

13.6 The DSL is responsible for maintaining all child protection records. Disclosure is permitted only to individuals who need the information to safeguard the child, and always in collaboration with statutory partners (e.g. police, social care) under Section 47 of the Children Act 1989 and Working Together to Safeguard Children.

13.7 The school ensures secure handover of child protection files when a student moves to another school, sent separately from the main pupil file, with confirmation of receipt obtained. Such transfer will take place within 5 days of the student joining the school roll.

Records will include:

- Detailed, accurate accounts of concerns
- Decisions made and their rationale (including where referrals were/not made)
- Actions taken and their outcomes Compliance with DfE Guidance
- CPOMS files

13.8 The DSL can consider if it would be appropriate to share any information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. The school recognises it is good practice for a conversation to take place between the DSLs at both settings, where there are issues and concerns, and takes reasonable steps to achieve this.

13.9 The school refers to the DfE's "Data Protection: a toolkit for schools", ensuring robust policy development, data access processes, and breach prevention measures are in place. All actions are guided by statutory safeguarding and data protection requirements.

Mandatory reporting

Mandatory reporting: Female Genital Mutilation (FGM)

14.1 Whilst all staff should report any concerns about Female Genital Mutilation (FGM) to the DSL or a deputy, there is a specific statutory duty on teachers. If a teacher discovers that FGM appears to have been carried out on a girl under 18, or believes she is at risk, even if the incident occurred outside school, they must report it directly to the police and do so within 24 hours or as soon as reasonably practicable. They should also inform the DSL, unless there is a strong reason not to, and engage children's social care as appropriate. This duty derives from Section 5B of the Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015.

Allegations against staff

Staff guidance and professional conduct

15.1 This section covers allegations or disclosures that may meet the statutory safeguarding threshold under KCSIE . These include cases where a staff member, governor, volunteer, or contractor has:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved in a way that indicates they may pose a risk of harm to children
- Demonstrated behaviour that may render them unsuitable to work with children.
- 15.2 Allegations meeting this threshold are managed under the school's Appendix 1 Allegations
- Procedures, which follow the statutory guidance.

15.3 All staff receive annual training in safe working practices to ensure their behaviour does not place students, or themselves, at risk of harm or of allegations of harm, and are provided with the Staff Code of Conduct each year. Staff are required to confirm that they have received, read, and understood the document, ensuring they remain aware of their professional responsibilities and maintain appropriate boundaries, vigilance, and safeguarding practices at all times. Staff should take particular care when working one-to-one with students, especially during individual tuition, to ensure appropriate safeguards are in place

15.4 The school promotes an open and transparent culture in which staff feel confident to self-refer if they believe they have behaved in a way that could be misinterpreted or may fall below professional standards.

15.5 As part of the school's whole-school approach to safeguarding, it is vital that all concerns and allegations about adults working in or on behalf of the school are dealt with promptly, fairly, and appropriately. The school promotes a culture of openness where staff are encouraged, even expected, to self-refer if they believe they may have fallen below expected professional standards.

15.6 Records of concerns are regularly reviewed by the DSL, Head of HR and High Mistress to identify any patterns of behaviour that may require further action, training, or escalation to the appropriate safeguarding threshold.

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.

Informing parents

17.1 SPGS will always adopt a child-centred approach. This means placing the child at the heart of decision-making and actively listening to their views and wishes.

17.2 The school counselling service is confidential. Students may access this service without parental consent. Parents will not be informed unless safeguarding concerns arise — for example, concerns relating to self-harm, disordered eating, or suicidal ideation. In such cases, the matter will be referred to the DSL, who will determine whether and when to inform parents. This decision will be based on the level of risk and will involve the child in the conversation.

17.3 In most circumstances, parents will be appropriately informed of any actions taken under these procedures. However, there may be instances where the DSL must consult with the Local Authority Designated Officer (LADO), children's social care, the police and/or the High Mistress before sharing details with parents.

17.4 Where there is reason to believe that informing parents could place a child at greater risk — for example, in cases involving female genital mutilation (FGM) or forced marriage — the DSL may, following consultation with the relevant authorities, decide to withhold such notification.

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:

Safeguarding on educational visits

18.2 The school carries out all required safeguarding checks in accordance with KCSIE, as detailed in the Educational Visits policy. In addition, the school reserves the right to exclude a student from participating in an educational visit for medical, mental health or wellbeing reasons.

Students absent from education and children missing education

18.3 A child's prolonged or repeated absence from school can be a significant safeguarding indicator, potentially signalling abuse, neglect, or mental health concerns. The school closely monitors patterns of absence and initiates early intervention if a student's attendance falls below 90%, especially for vulnerable pupils including those with a social worker or known to children's social care or with an additional learning need. Children on CIN or CP plans are followed up after two consecutive days of absence.

18.4 Children missing education, or whose absence is unexplained or persistent, may be facing underlying safeguarding risks such as exploitation, bullying, or family adversity. These patterns can disproportionately affect vulnerable groups, including SEND pupils and those with social worker involvement. Prompt follow-up and welfare checks are essential.

Attendance recording and data sharing obligations

18.5 The school records attendance in compliance with the Education (Pupil Registration) (England) Regulations 2024. *Working Together to Improve School Attendance* sets out that:

- Schools must inform the local authority if a pupil has not attended school for 10 consecutive unauthorised school days
- Similarly, for prolonged or multiple periods of illness-related absence, schools must notify the LA if the child is expected to miss 15 school days cumulatively

- Local authorities also require notification where pupils have missed 20 school days, depending on local protocols.

18.6 Should any pupil be missing in the context of a school trip, the school applies procedures outlined in the Missing Student procedures.

Risk assessment

18.7 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 Assistant Head (Co-Curricular) who is the 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.

Visitors

19.1 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 at reception
- Must wear a visible lanyard (see chart below) and visible ID as appropriate, unless they are attending a larger event in which case arrangements are made for the supervision of students
- Remain supervised unless agreed otherwise by HR / DSL (and on a black lanyard)
- Visitors are not permitted to use their mobile devices whilst on site or to take photographs on site unless authorised to do so by their host who will undertake the necessary internal checks beforehand.

Black SPGS Logo 'STAFF'	Green SPGS LOGO 'CONTRACTOR'	Red	Light blue
Enhanced DBS checked Unsupervised access	Enhanced DBS checked Unsupervised access	Not DBS checked, must be supervised	DBS checked Unsupervised but limited access
Core staff VMTs Counsellors CSCT Consultants Sports Coaches Those meeting the threshold of 'frequent visitors' who have met the requirements of the school's Staff Safer Recruitment and Safeguarding policy (including staff from SPS and Governors); lanyards are	Contractors	Visitors Contractors who are not cleared and therefore must be supervised on site.	Parent Guild

handed back in as the person leaves:			
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School premises

19.2 The school takes all practicable steps to ensure that school premises are as secure as circumstances permit.

19.3 Where external organisations hire the school's premises for activities involving children, the school requires and reviews the organisation's safeguarding policy and relevant risk assessments as part of the hire agreement. Organisations are also required to confirm that they have undertaken all necessary safer recruitment checks for staff leading and/or using the facilities for the purpose of the hire, and that they have received appropriate training.

19.4 Where the school hosts out-of-hours or weekend activities, a clear risk assessment/safeguarding plan must be in place. For example, evening or weekend drama rehearsals should be subject to a robust safety plan, aligned with the expectations outlined in the Staff Code of Conduct. This should include provisions such as ensuring staff are not working one-to-one with a student in an unsupervised context, and that at least two members of staff are present on site at all times.

19.5 Similarly, Partnerships work, which often takes place at weekends, must collaborate closely with the DSL to ensure the safety and protection of all children on site. This must be supported by a comprehensive risk assessment/safeguarding plan, including (but not limited to): appropriate safer recruitment and vetting checks for all visiting staff, the identification of a named safeguarding lead within the partnership organisation, and clear protocols for the timely sharing of any safeguarding concerns with the Designated Safeguarding Lead (DSL).

19.6 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.

Monitoring and review

20.1 All safeguarding events from which learning can be identified may trigger a full review of the school's safeguarding procedures, including this policy, to identify any areas for improvement and ensure that future risks are minimised. If an incident involves a member of staff, the LADO will support this review to assess the effectiveness of procedures and identify learning points. The review will also examine the school's collaboration and communication with external safeguarding agencies. The DSL is responsible for the ongoing monitoring of this policy and its implementation, ensuring it remains effective in practice and reflects current statutory requirements.

20.2 The school will, where appropriate, appoint an independent critical friend to complete a review and provide objective scrutiny and support the identification of learning and improvement opportunities. As per paragraph 4.1, the school undertakes an annual audit of its safeguarding arrangements.

20.3 The findings of the annual review will be reported to the full Board, including an evaluation of how effectively safeguarding duties have been fulfilled. Where necessary, the governors will make recommendations for improvements and ensure that any weaknesses in safeguarding arrangements are addressed immediately and without delay.

Key Contacts

Where a child is in immediate danger, dial 999 to seek help

Role	Name	Telephone	Email
DSL	Sophie McGeoch, Deputy Head (Safeguarding & Inclusion)/DSL	020 7605 1118 07833 450 893	Sophie.mcgeoch@spgs.org
Deputy Designated Safeguarding Lead	Kate Renshaw, Deputy Head (Pastoral)	020 7605 4892	directorofpastoral_care@spgs.org
Deputy Designated Safeguarding Lead	Helen Dangerfield, Deputy Head (Senior School)	020 7605 4817	directorofseniorschool@spgs.org
Deputy Designated Safeguarding Lead	Jade Ramsay, Head of Middle School	020 7605 1128	jade.ramsay@spgs.org
Deputy Designated Safeguarding Lead	Chloe Lallyett, Head of Lower School – maternity cover	020 7605 4893	chloe.lallyett@spgs.org
Deputy Designated Safeguarding Lead	Sydne Derbyshire (Head of UIV)	020 7605 4829	sydne.derbyshire@spgs.org
High Mistress	Liz Hewer	020 7605 4801	hmea@spgs.org
Chair of Governors	Simon Wathen	Governors can be contacted by emailing them at clerk@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	
Governor with responsibility for Safeguarding	Geeta Khehar		
Governor with responsibility for Online Safety	Mairi Brewiss		
Deputy Chair of Governors	Zeina Bain		

Reporting outside school hours/emergency contacts

Agency	Email Contact	Telephone
Hammersmith & Fulham Children's Safeguarding Hub	familyservices@lbhf.gov.uk	020 8748 8588
Richmond & Kingston Children's Safeguarding Hub	fis@achievingforchildren.org.uk	020 8770 5000
Kensington Children's Safeguarding Hub	socialservices@rbkc.gov.uk	020 7373 2227
CEOP	Report to CEOP	0800 1111

Hammersmith and Fulham's Local Safeguarding Children Partnership

Role	Email Contact	Telephone
Hammersmith and Fulham Initial Contact and Advice Team	familyservices@lbhf.gov.uk	General enquiries: 020 8753 6600

(ICAT/MASH)		Anonymous advice: 020 8753 6610 Out of hours: 020 8748 8588
Local Authority Designated Officer (LADO) Safer Organisations and Safeguarding in Education Manager	LADO@lbhf.gov.uk Kembra.healey@lbhf.gov.uk Laura Thompson/Kembra Healey	Out of hours: 020 8748 8588 Duty admin: 020 8753 5125 Mobile phone: 07776 673 020
Head of Safeguarding Review	anna.carpenter@lbhf.gov.uk	020 8753 5124
Safeguarding Children Partnership Board (HFLSCPB)	hflscpb@lbhf.gov.uk	General enquiries: 020 8748 3020
Prevent advice regarding radicalisation and extremism	preventenquiries@lbhf.gov.uk	General enquiries: 020 8753 5727
Anti-terrorist hotline		General enquiries: 0800 789 321
Local Police		Non-emergency: 101 Emergency: 999
DfE counter-extremism non-emergency helpline		020 7340 7264

Other local authorities

Local Authority	Working hours	Out of hours
Brent	020 8937 4300	020 8863 5250
Camden	080 7947 3317	020 7974 4444
Ealing	020 8825 8000	020 8825 8000 or, 5000
Hounslow	020 8583 3456 (child protection) 020 8583 3300 (social services)	020 8583 3456 (child protection) 020 8583 2222 (social services)
Islington	020 7527 7400	020 7226 0992
Kensington and Chelsea	020 7361 3013	020 7373 2227
Kingston	020 8547 5008	020 8770 5000
Merton	020 8545 4226 or, 4227	020 8770 5000
Richmond	020 8891 7969	020 8770 5000
Wandsworth	020 8871 6622	020 8871 6000
Westminster	020 7641 4000	020 7641 6000

National helplines

Organisation	Telephone
Childline	0800 1111

NSPCC NSPCC Whistleblowing advice line Mental Health Crisis Line	0808 800 5000 0800 028 0285 0800 028 3550 help@nspcc.org.uk
Ofsted's Whistleblower Hotline	0300 123 3155
Kidscape (Anti-bullying helpline for parents)	0300 102 4481 WhatsApp 07496 682785
Child Exploitation Online Prevention (CEOP)	0870 000 3344
Samaritans	116 123
Mental Health Crisis Line	0800 328 4444
Speak CAHMS Helpline	0800 328 4444

Appendix 1 Allegations against staff, volunteers, governors and supply staff

This appendix sets out the procedures for managing concerns or allegations that an adult working in or on behalf of the school 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 they may pose a risk of harm to children;
- or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These align with Part 4 of KCSIE and apply to staff, supply teachers, volunteers, contractors and governors.

Initial Actions

Any concern regarding a serious safeguarding risk, systemic issue or allegation of abuse against a member of staff should be reported promptly through StaffSafe in accordance with the school's safeguarding and whistleblowing procedures. StaffSafe is monitored by members of the safeguarding team including the DSL and the High Mistress. These records must include:

- The details of the concern
- The context in which the concern arose
- Details of any actions which have already been taken in response (note that it is not the responsibility of staff to investigate, resolve, or determine the outcome of a situation. Their role is to observe, record, and report concerns. Any investigation or further action will be undertaken by the Designated Safeguarding Lead (DSL), the High Mistress, or the Head of HR, as appropriate).
- The name of the individual reporting the concern (unless raised anonymously)

Where necessary, the High Mistress (or delegated senior member of staff) should gather as much information as possible by speaking to the individual raising the concern (unless raised anonymously), the member of staff involved, and any witnesses

Reports will be triaged and considered by the Head of HR, the DSL and the High Mistress, who will determine the next steps. Where a concern suggests that a child (or member of staff) may be at immediate risk of harm, the matter should be brought directly to the attention of the High Mistress without delay. In her absence the DSL. For all cases involving the LADO (who will be informed if necessary, within one working day), the High Mistress will be the school's primary point of contact with the LADO. The LADO will report to and liaise directly with the High Mistress, unless the High Mistress formally delegates this responsibility to another appropriate member of staff

Specific cases

- Allegations against supply staff: the school will inform the agency and work with them and the LADO in line with KCSIE guidance. The school will retain the lead role throughout.
- For allegations involving external users of the premises (e.g. hirers or visiting professionals), the school must inform the LADO and follow safeguarding procedures.

Informing the accused and the parents

- The accused will be informed as soon as possible after LADO consultation.
- Parents of the child(ren) involved will also be informed at an appropriate point, as agreed with the LADO, and kept updated throughout.

Support and confidentiality

- The accused will be offered a named contact for pastoral support during the process.
- The school will maintain confidentiality as required by Section 141F of the Education Act 2002, preventing publication of details that may lead to the identification of a teacher who is the subject of an allegation.

Investigation and outcomes

If police or social care are not involved, the LADO will advise the High Mistress on the appropriate course of action, which may include:

- No further action
- Disciplinary investigation
- Suspension (if necessary – see below)

The following outcomes may be recorded:

- Substantiated
- False
- Malicious
- Unsubstantiated
- Unfounded

Records of the allegation, decisions made and actions taken will be retained on the individual's personnel file until at least the date of retirement or for 10 years, whichever is longer.

Suspension

Suspension is not automatic and will only be considered when:

- there is a risk to children;
- a police investigation is required; or
- the case is so serious that dismissal is a likely outcome.

The High Mistress (or Chair) will consult the LADO and consider alternatives (e.g. redeployment) before making this decision. If suspension is necessary, the rationale will be recorded and the member of staff will be notified in writing within one working day.

Conclusion of cases

If the accused is reinstated, the school will consider how best to support reintegration, including phased return, mentoring, or adjustments to responsibilities. Allegations proven to be false or malicious will not be included in references.

Where a person ceases to work in regulated activity due to a safeguarding concern, the school will make a referral to the Disclosure and Barring Service (DBS) within one month. If the individual is a teacher, the Teaching Regulation Agency (TRA) may also be informed.

Resignation or settlement agreements

A resignation or agreement not to proceed with a disciplinary hearing will not prevent the case being referred to the DBS and/or the TRA where appropriate. Settlement agreements will never be used in place of safeguarding referrals.

Timescales

Cases will be resolved as quickly as possible:

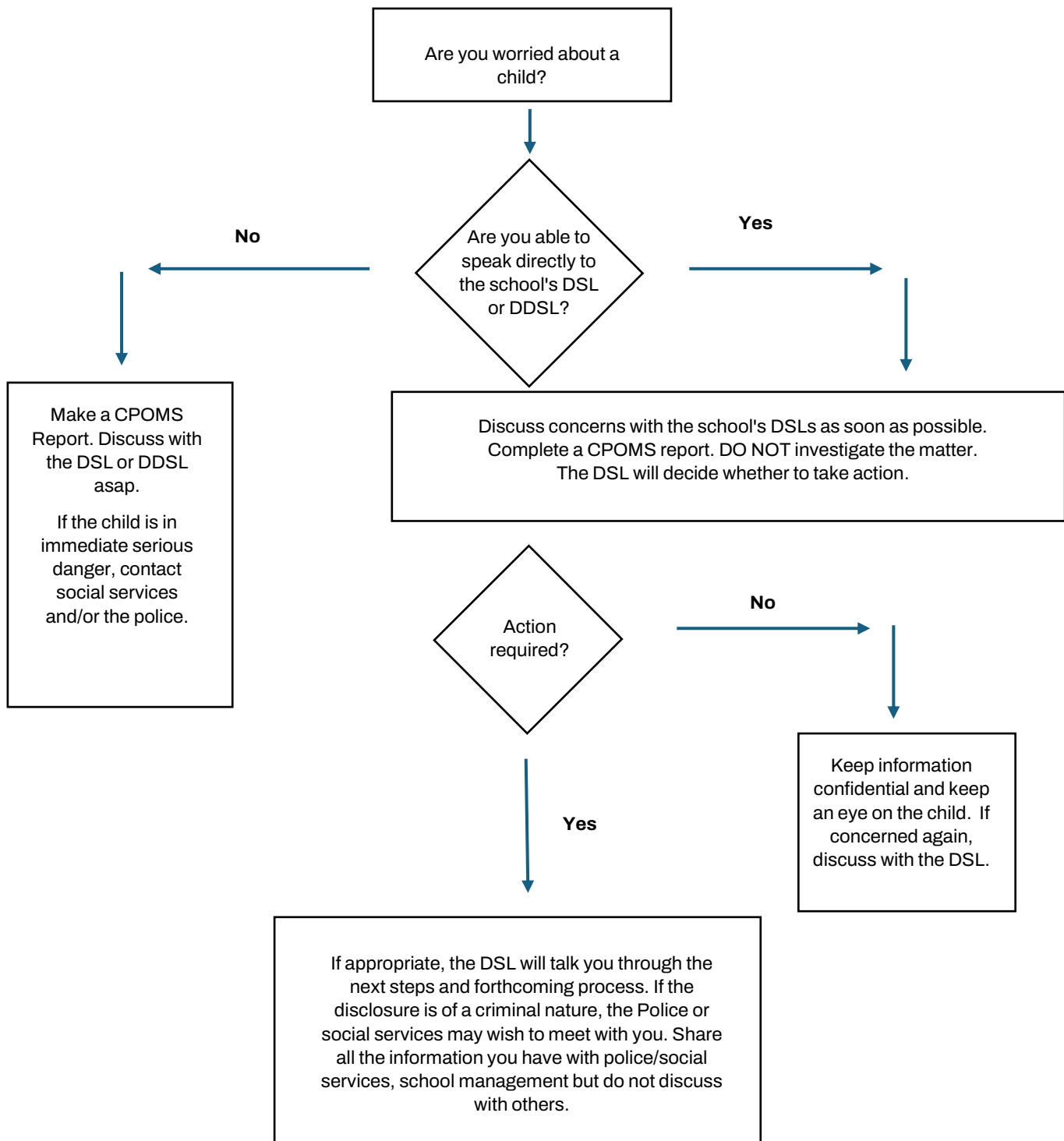
- Unsubstantiated cases resolved within 1 week
- 80% resolved within 1 month
- 90% resolved within 3 months
- Only exceptional cases exceeding 12 months

Malicious or false allegations

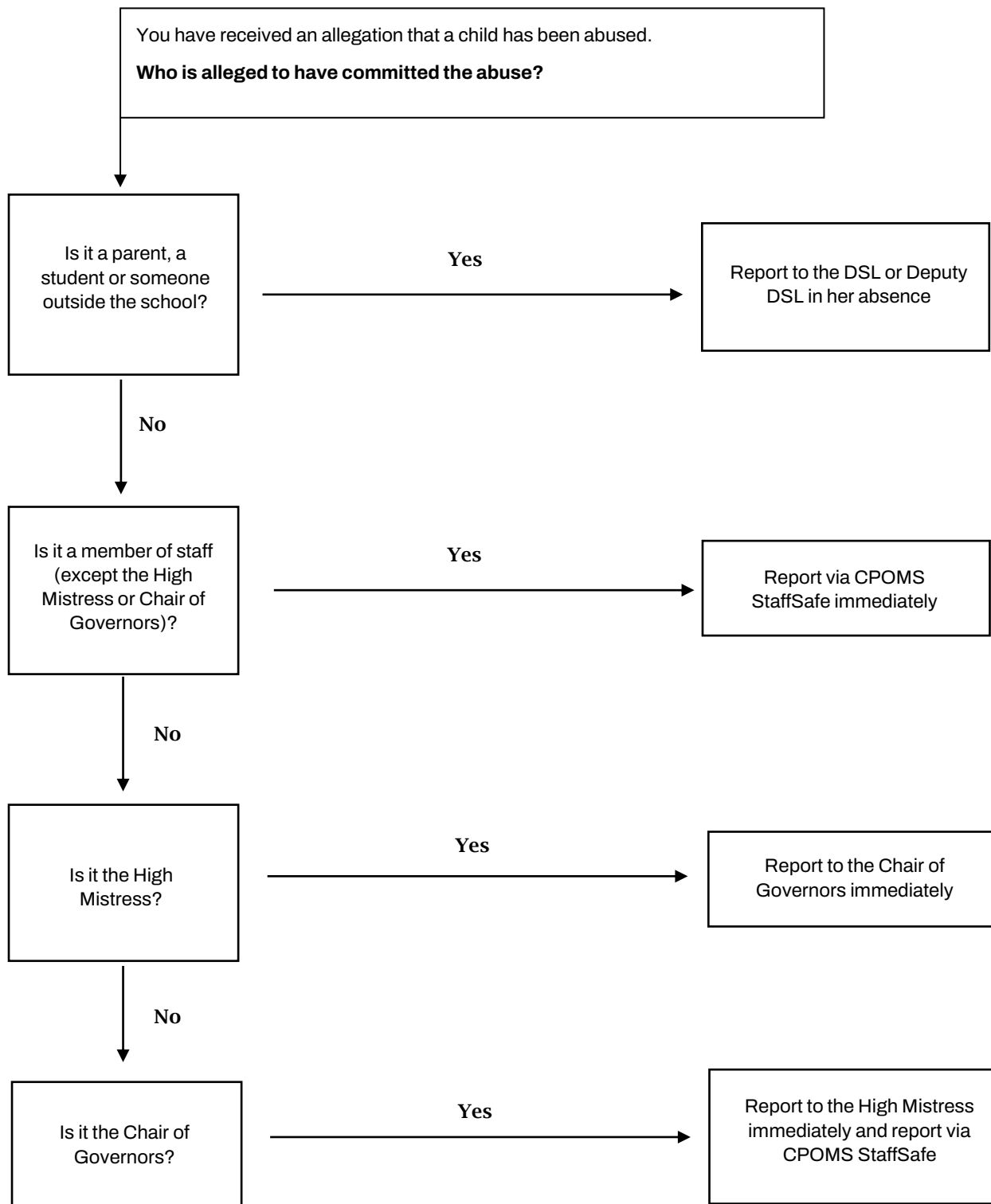
Where an allegation is found to be deliberately invented or malicious:

- The school may contact children's social care if the pupil is in need of support.
- The High Mistress will consider appropriate disciplinary action.
- Where a parent is responsible, the school may require the withdrawal of their child.
- The police may be contacted in appropriate cases.

Appendix 2 - Flowchart for a member of staff worried about a student



Appendix 3 - Flowchart for when receiving an allegation of child abuse



* The LADO may be contacted once the allegation has been reviewed by DSL/High Mistress

Appendix 4: Flowchart for management of safeguarding concerns regarding staff conduct (guidance only)

