FHS
Francis Holland Schools

Safeguarding and Child Protection Policy

This policy applies to:
Francis Holland Regents Park Francis Holland Sloane Square Francis Holland Prep
Where there are differences between the schools these have been clearly highlighted.

Policy owner	RP: Assistant Head Pastoral & Designated Safeguarding Lead SSq: Senior Deputy Head Pastoral & Designated Safeguarding Lead Prep: Senior Deputy Head & Designated Safeguarding Lead
Type of policy	Regulatory - Regulation number: Part 3 para 4.5 To meet the standard, a proprietor must have a comprehensive safeguarding policy
Last reviewed / approved by / date	Education Committee: by email 27th August 2024 [due to KCSIE update requirements]
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Next council review due	31st August 2025
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Linked Policies	Anti-Bullying Attendance Behaviour and Sanctions Staff code of conduct Complaints from Parents of Pupils Curriculum Equality, Diversity, Inclusion and Belonging Exclusions First aid and accident policy Health and safety IT Acceptable Use Agreement Learning Needs Online Safety

	Privacy notices PSHE & RSE Recruitment, Selection and Disclosure

Revision History This section should be completed by the reviewer each time this policy is reviewed	
Changes made [Brief description of edits]	Date
New policy drafted adapting The Key's template policy issued following the publishing of theDfE's updated KCSIE guidance in July 2022	Summer 2022
Updated in line with DfE's updated KCSIE guidance in July 2023	Summer 2023
Updated • Online safety rather than 'digital/electronic safety' • Added the need to review in line with legislative changes • Safer recruitment section removed with reference to the policy • Additional safeguarding issues added	22/02/24
Updated in line with KCSIE 2024 • Additional responsibility to *provide help and support to meet the needs of children as soon as problems emerge* added • Safeguarding staff and contact details updated • Inclusion of computer-generated imagery • Inclusion of 'new and emerging threats' to ensure staff stay up to date • 'Trans' amended to 'gender questioning' in line with latest terminology for children and a section added (13) regarding Lesbian, Gay, Bisexual or Gender Questioning pupils • Factors that make children more vulnerable added to section 7 • Flowchart on p20 simplified • Section added on Artificial Intelligence (8.1) • Appendices amended to reflect the separation of the Recruitment, Selection and Disclosure policy (formerly Appendix 2) • Addition of 'Assessing adult-involved nude and semi-nude sharing incidents' (Appendix 3) • Updated definitions of radicalisation and extremism (Appendix 3) • Appendix 5 updated and changed to Appendix 4 (Staff Code of Conduct)	July 2024

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding leads (DSL)	Sloane Square: Sarah Pittaway – Senior Deputy Head Pastoral Regent's Park: Nick Gridelli – Assistant Head Pastoral and DSL Prep (including EYFS): Caroline Smith – Deputy Head	(0)20 7730 2971 Email: sarah.pittaway@fhs-sw1.org.uk (0)20 7723 0176 Ext: 3216 Email: nicola.gridelli@fhs-nw1.org.uk (0)20 7352 7077 Email: caroline.smith@francishollandprep.org.uk
Deputy DSLs	Sloane Square: Clare Stansfield – Head of Sixth Form Charlotte Hanrahan – Safeguarding Officer Regents Park: Colette Mahieu – Deputy Head Pastoral Maria Merrigan – Head of Middle School and Head of PSHE Loretta Herrera – Head of Upper Fourth Prep (including EYFS): Suzy Dixon – Head of Prep Chrysa Ratziki - Head of Inclusion Andrew Hart – Deputy Head Hilary Dixon – Head of Wellbeing	Email: clare.stansfield@fhs- sw1.org.uk Ext: 3256 Email: charlotte.hanrahan@fhs-sw1.org.uk Colette.mahieu@fhs-nw1.org.uk maria.merrigan@fhs-nw1.org.uk loretta.herrera@fhs-nw1.org.uk Email: suzy.dixon@francishollandprep.org.uk chrysa.ratziki@francishollandprep.org.uk andrew.hart@francishollandprep.org.uk hilary.dixon@francishollandprep.org.uk
Local authority designated officer (LADO)	Westminster & RBKC LADO	0207 641 7668 LADO@westminster.gov.uk
Chair of governors	Mr Patrick Sherrington	Contact via the Bursary 0207 730 8359
Safeguarding Governors	Dr Frances Baawuah, MBChB, MRCP, MRCGP, DFSRH Mrs Fiona Angel, BA, Deputy Master (Pastoral) at Dulwich College	frances.baawuah@fhst.org.uk fiona.angel@fhst.org.uk
Channel helpline		020 7340 7264

1. Aims

- The Trust aims to ensure that:
    - Appropriate action is taken in a timely manner to safeguard and promote children's welfare
    - All staff are aware of their statutory responsibilities with respect to safeguarding,
        - To provide 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;
        - To prevent impairment of children's mental and physical health or development;
        - To ensure children grow up in circumstances consistent with the provision of safe and effective care;
        - To take action to enable all children to have the best outcomes
    - Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at school

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteachers should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our schools to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how

to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children

Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

3. Definitions

Safeguarding and promoting the welfare of children means:

- 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 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
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18. This policy is written in line with the guidance *Keeping Children Safe in Education* and therefore references children; but in our context, children/child/young person means any pupil of the school, including those who are 18 years or over.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA): Hammersmith & Fulham Council, Kensington & Chelsea Council, Westminster Council
- The NHS North West London Integrated Care Board (previously known as clinical commissioning groups)
- The chief officer of police for a police area in the LA area: Central West Basic Command Unit

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive

behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

- Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- We give special consideration to children who:
    - Have special educational needs (SEN) or disabilities or health conditions (see section 10)
    - Are young carers
    - May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
    - Have English as an additional language
    - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
    - Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
    - Are asylum seekers
    - Are at risk due to either their own or a family member's mental health needs
    - Are looked after or previously looked after (see section 12)
    - Are missing or absent from education for prolonged periods and/or repeat occasions
    - Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

- Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the Trust and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.
- The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:
    - Behaviour and Sanctions policy
    - Pastoral support system
    - Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
        - Healthy and respectful relationships
        - Boundaries and consent
        - Stereotyping, prejudice and equality
        - Body confidence and self-esteem
        - How to recognise an abusive relationship (including coercive and controlling behaviour)
        - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
        - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

- All staff who work directly with children will read and understand Part 1 and Annex B of the Department

for Education's statutory safeguarding guidance, *Keeping Children Safe in Education*, and review this guidance at least annually.

- Staff who don't work directly with children must read either Part 1 of KCSIE or Annex A of KCSIE (a condensed version of part 1).
- All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- All staff will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- All staff will provide a safe space for pupils who are Lesbian, Gay, Bisexual or Gender

Questioning to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, CPOMS, the Behaviour and Sanctions policy, the Online Safety policy which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation and serious violence (including to that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSLs are:

- Sarah Pittaway, Senior Deputy Head Pastoral at Sloane Square
- Nick Gridelli, Assistant Head Pastoral and DSL at Regent's Park
- Caroline Smith, Deputy Head at Francis Holland Prep

The DSLs take lead responsibility for child protection and wider safeguarding in the Trust. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours, the DSLs can be contacted by email which will be checked periodically.

When the DSL is absent, the deputy DSLs will act as cover:

At Francis Holland Prep

- Suzy Dixon, Headteacher
- Andrew Hart, Deputy Head
- Chrysa Ratziki, Head of Inclusion
- Hilary Dixon, Head of Wellbeing

At Sloane Square

- Clare Stansfield, Head of Sixth Form
- Charlotte Hanrahan, Safeguarding Officer

At Regent's Park

- Colette Mahieu, Deputy Head Pastoral
- Maria Merrigan, Head of Middle School and Head of PSHE
- Loretta Hererra, Head of Upper Fourth

The DSLs will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our schools
- Make sure that staff have the appropriate Prevent training and induction

The DSL will also:

- Keep the headteachers informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate

- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and deputies are set out in their job description

5.3 The governing board

The governing board will:

- Facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteachers to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSLs
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the schools have appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 2 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection

policies/procedures in place, and inspect them if needed

- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteachers, where appropriate (see appendix 2).
- All governors will read *Keeping Children Safe in Education* in its entirety and sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Section 15 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteachers

The headteachers are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the schools' websites
- Ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Overseeing the safe use of technology, mobile phones and camera in the EYFS setting

5.5 Virtual school heads

- Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.
- They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

- When it comes to sharing information for safeguarding purposes within Francis Holland, with the three safeguarding partners and other agencies as required, the following should be noted:
  - Timely information sharing is essential to effective safeguarding
  - Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
  - The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of

information for the purposes of keeping children safe

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk)
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 2

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home

- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

- Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral.**
- Tell the DSL (see section 5.2) as soon as possible if you make a referral directly. You need to contact the borough of residence of the child concerned.
    - Kensington & Chelsea 020 7361 3013 socialservices@rbkc.gov.uk
    - Westminster 020 7641 4000 accesstochildrensservices@westminster.gov.uk
    - Hammersmith and Fulham 020 8753 6610
    - Camden 020 7974 3317
    - Alternatively, the police can be contacted on 101 or 999.

https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

- If a child discloses a safeguarding issue to you, you should:
    - Listen to and believe them. Allow them time to talk freely and do not ask leading questions
    - Stay calm and do not show that you are shocked or upset
    - Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
    - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
    - Write up your conversation as soon as possible in the child's own words by completing an incident log on CPOMS. Stick to the facts, and do not put your own judgement on it
    - Sign and date the write-up if handwritten and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to

anyone else unless told to do so by a relevant authority involved in the safeguarding process

- Bear in mind that some children may:
  - Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
  - Not recognise their experiences as harmful
  - Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

- *Keeping Children Safe in Education* explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.
- **Any teacher** who either:
  - Is informed by a girl under 18 that an act of FGM has been carried out on her; or
  - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.
- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
- The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures, completing an incident form on CPOMS.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

- Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.
- Where possible, speak to the DSL first to agree a course of action.
- Complete an incident log on CPOMS
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below).

Share any action taken with the DSL as soon as possible.

Early help assessment

- If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
    - To access early help for children in Westminster see here.
    - To access early help for children in Kensington and Chelsea see here.
    - To access early help for children in Hammersmith and Fulham see here.
    - To access early help for children in Camden see here.

Referral

- If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
- To make a referral a MARF must be completed (available on the safeguarding section of each website of the relevant local authority) or an email sent. Concerns will be escalated where necessary by contacting the relevant manager within children's services.

7.5 If you have concerns about extremism

- If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
    - Think someone is in immediate danger
    - Think someone may be planning to travel to join an extremist group

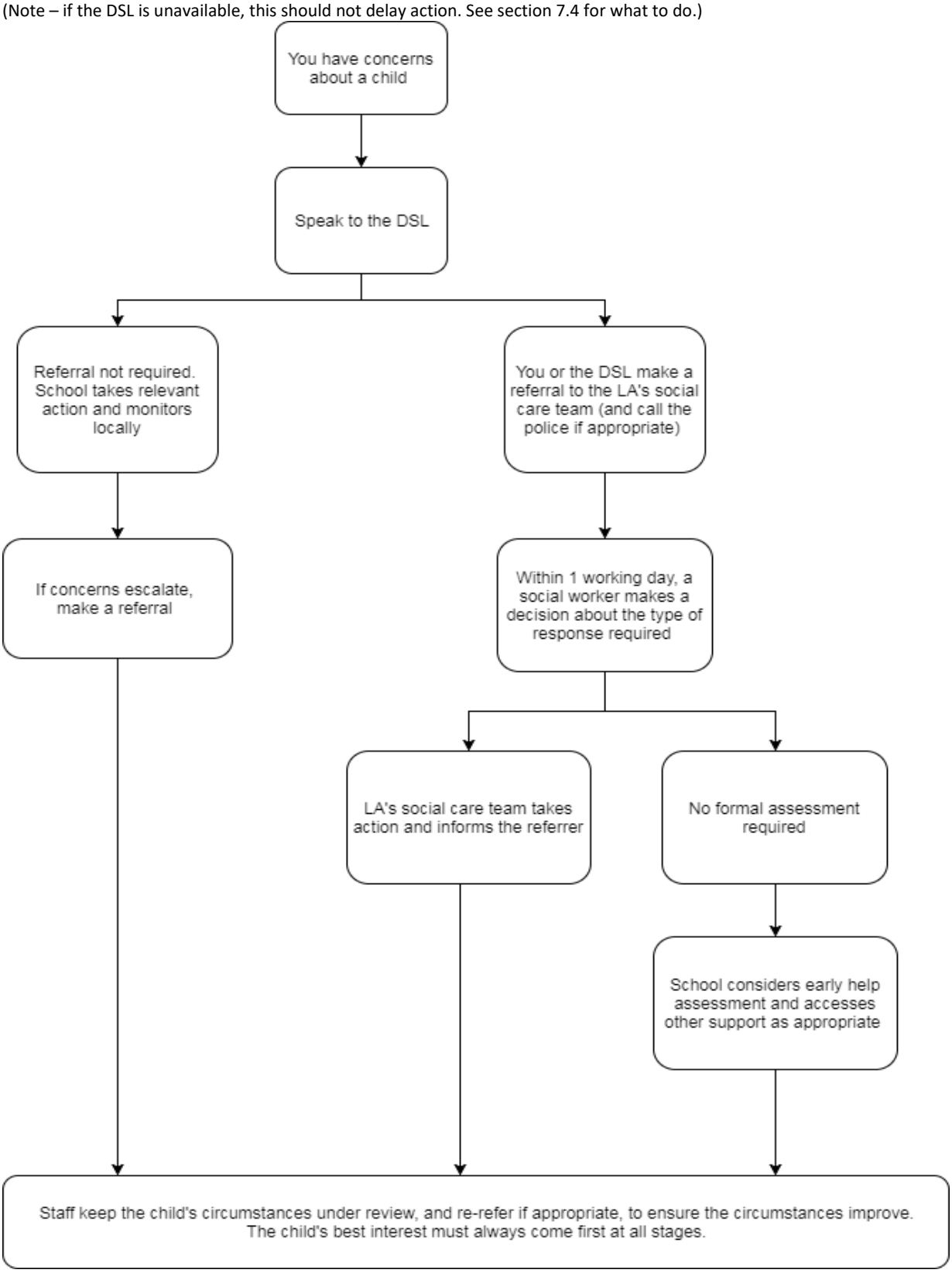
- See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

- Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.
- If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Please read the Department for Education guidance on mental health and behaviour in schools for more information. Staff should liaise with Heads of Year and the DSLs who will consult with the school counselling team for advice and guidance.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher, volunteer or contractor

- If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, communicate with the relevant headteacher as soon as possible. If the concerns/allegations are about the headteacher, communicate with the chair of governors.
- The headteacher/chair of governors will then follow the procedures set out in appendix 2, if appropriate.
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).
- If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.
- Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 2 for more detail).
- Where appropriate, the Trust will inform relevant agencies and regulators of the allegation and actions taken, within the necessary timescale (see appendix 2 for more detail).

7.8 Allegations of abuse made against other pupils

- We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.
- We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
- Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
    - Is serious, and potentially a criminal offence
    - Could put pupils at schools in the Trust at risk
    - Is violent
    - Involves pupils being forced to use drugs or alcohol
    - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

- If a pupil makes an allegation of abuse against another pupil:
    - You must record the allegation and tell the DSL, but do not investigate it
    - The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
    - The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- Victims will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. Staff should remember that in instances of child-on-child abuse perpetrators are often also victims.

- The DSL will advise as to appropriate next steps in light of the wider safeguarding context of the school. Important considerations will include:
  - The wishes of the victim in terms of how they want to proceed
  - The nature of the alleged incident(s)
  - The ages and developmental stages of the children involved
  - Any power imbalance between the children
  - Whether the alleged incident is a one-off or a sustained pattern of abuse
  - Any ongoing risks to the victim or others

Creating a supportive environment in the schools in the Trust and minimising the risk of child-on-child abuse

- We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
- To achieve this, we will:
  - Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
  - Be vigilant to issues that particularly affect female pupils – for example, sexualised or aggressive touching or grabbing
  - Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
  - Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
  - Ensure staff reassure victims that they are being taken seriously
  - Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
  - Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
  - Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
  - Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in the schools in the Trust, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.
- You must **not**:
  - View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
  - Delete the imagery or ask the pupil to delete it
  - Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
  - Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
  - Say or do anything to blame or shame any young people involved
  - You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
    - Whether there is an immediate risk to pupil(s)
    - If a referral needs to be made to the police and/or children's social care
    - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
    - What further information is required to decide on the best response
    - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
    - Whether immediate action should be taken to delete or remove images or videos from devices or online services
    - Any relevant facts about the pupils involved which would influence risk assessment
    - If there is a need to contact another school, college, setting or individual
    - Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children's social care if:
    - The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
    - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
    - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
    - The imagery involves sexual acts and any pupil in the images or videos is under 13
    - The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

- If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the pupils involved (if appropriate).
- If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

- The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through calling 101 or contacting our safer schools' team key officer:

Kerryn Wollaston: Kerryn.L.Wollaston@met.police.uk

Kerryn Pearse PS 296AW

Safer Schools Westminster
Metropolitan Police Service
Mobile 07776678276
Charing Cross Police Station, Agar Street, London WC2N 4JP

PS Tom Morris 130AW
Youth Supervisor
Volunteer Police Cadets / Safer Schools Kensington Police Station
Central West BCU
Metropolitan Police Service
M: 07436 374164
W: www.met.police.uk
E: tom.morris2@met.police.uk

Recording incidents

- All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

- Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE, RSE and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
    - What it is
    - How it is most likely to be encountered
    - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
    - Issues of legality
    - The risk of damage to people's feelings and reputation

    Pupils also learn the strategies and skills needed to manage:

    - Specific requests or pressure to provide (or forward) such images
    - The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education, including:

- Putting safeguarding first
- Approaching from the perspective of the child
- Promoting dialogue and understanding
- Empowering and enabling children and young people
- Never frightening or scare-mongering
- Challenging victim-blaming attitudes

7.10 Reporting systems for our pupils

- Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
    - Put systems in place for pupils to confidently report abuse
    - Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
    - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
    - Pupils will be able to report their concerns by talking to any member of staff
    - Pupils will be made aware of reporting systems through discussion in our relationship/sex education curriculum, through form time and assemblies.
    - The DSL will make pupils feel safe in submitting any concerns by ensuring pupils are reassured following disclosures.

8. Online safety and the use of mobile technology

- We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- To address this, our Trust aims to:
    - Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
    - Protect and educate the whole school community in its safe and responsible use of technology devices, social networks and other online platforms including mobile and smart technology (which we refer to as 'mobile phones')
    - Set clear guidelines for the use of devices for the whole school community
    - Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

- Our approach to online safety is based on addressing the following categories of risk:
    - **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
    - **Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber- bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year

- Educate parents/carers about online safety via communications sent directly to them, parenting talks and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to the Trust's premises for their own use, but are to remain aware of appropriate use of technology in a school context
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
  - The EYFS iPad is used for taking photographs of the pupils, as well as for maintaining assessment records through the Teachermate EYFS Profiles software. EYFS staff do not take mobile phones into the classrooms
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet within the Trust, use of the Trust's ICT systems and use of their mobile and smart technology
- At Sloane Square, all pupils in Years 7-11 will secure their mobile phones in *Yondr* pouches for safekeeping during the school day and have no access to them throughout the school day
- At Regents Park, pupils in Years 7-8 will secure their mobile phones in *Yondr* pouches and pupils in Years 9-10 will place their mobile phones in labelled storage boxes for safekeeping during the school day and have no access to them throughout the school day. Pupils in Year 11 will turn their phones off and keep them in their school bag or locker for the entire school day.
- Pupils at the FH Prep do not have mobile phones in school.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the Trust's IT systems

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our Trust's community
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- This section summarises our approach to online safety and mobile phone use. For comprehensive details about our Trust's policy on online safety and the use of devices, please refer to our Online Safety policy which can be found on our website.

- **8.1 Artificial intelligence (AI)**
- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.
- Francis Holland Schools Trust recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- Francis Holland Schools Trust will treat any use of AI to access harmful content or bully pupils in line with this policy and our Anti-Bullying / Behaviour and Sanctions policies.
- Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

9. Notifying parents or carers

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
- The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):
    - Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
    - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

- We recognise that pupils with special educational needs (SEND) or certain health conditions can face

additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or being unable to understand the consequences of doing so
- We offer extra pastoral support for these pupils. This includes mentoring by our Learning Strategies Team or Learning Enhancement Department and additional training for all staff to raise awareness and understanding of the communication barriers pupils may face.
- Any abuse involving pupils with SEND will require close liaison with the DSL/DDSL and the SENDCO.

11. Pupils with a social worker

- Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:
    - Responding to unauthorised absence or missing education where there are known safeguarding risks
    - The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

- We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
    - Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
    - The DSL has details of children's social workers and relevant virtual school heads
- We have appointed appropriately trained teachers, Sarah Pittaway, Senior Deputy Head Pastoral at Sloane Square; Nick Gridelli, Assistant Head Pastoral and DSL at Regent's Park, Caroline Smith, Deputy Head at Francis Holland Prep, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.
- As part of their role, they will:
- Ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children.

We also recognise that Lesbian, Gay, Bisexual or Gender Questioning children are more likely to experience poor mental health. Any concerns should be reported to the DSL, our Diversity and Inclusion Leads and counselling service.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

14.2 Other complaints

All other complaints raised will be handled in accordance with our policy Complaints from Parents of Current Pupils available on our website.

If a concern or complaint is raised by parents/carers regarding our EYFS provision, a record of the complaint and its outcome will be kept. Any complaint relating to our fulfilment of EYFS requirements will be investigated and the complainants notified of the outcome within 28 days of having received the complaint. This record of complaints will be made available to OFSTED on request.

14.3 Whistle-blowing

- If there are concerns regarding the way the Trust safeguards pupils, including poor or unsafe practice, these should be raised with the DSLs and headteachers in the first instance.
- Concerns can also be raised with our safeguarding governors: Dr. Frances Baawuah frances.baawuah@fhst.org.uk and Mrs Fiona Angel fiona.angel@fhst.org.uk
- All concerns will be thoroughly investigated. If there remains a concern that the issue has not been dealt with properly or a concern has not been acted upon the NSPCC can provide external support: call 0808 800 5000 or email help@nspcc.org.uk
- See also separate Whistleblowing Policy in the Employment Manual and section 7.7 above regarding how to report concerns about a staff member, supply teacher, volunteer or contractor.

- If there are concerns regarding our EYFS provision, parents should contact OFSTED by email enquiries@ofsted.gov.uk or call 0300 123 1231

15. Record-keeping

- We will hold records in line with our records retention schedule.
- All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- Records will include:
    - A clear and comprehensive summary of the concern
    - Dates and times
    - Details of how the concern was followed up and resolved
    - A note of any action taken, decisions reached and the outcome
    - Concerns and referrals will be kept in a separate child protection file for each child.
    - Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely on CPOMs and only available to those who have a right or professional need to see them.
    - Safeguarding records relating to individual Prep school children will be passed on to their next school. Safeguarding records relating to individual Senior school children will be retained for a reasonable period of time after they have left the school.
    - If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
    - To allow the new school/college to have support in place when the child arrives, this should be within:
        - **5 days** for an in-year transfer, or within
        - **The first 5 days** of the start of a new term
    - In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- All records are kept electronically on CPOMS
    - CPOMS is accessible via two step verification by the safeguarding and pastoral teams
    - Information is shared via egress, a secure email platform.
- In addition:
- Our Recruitment, Selection and Disclosure policy sets out our policy on record-keeping specifically with respect to recruitment and pre- appointment checks
- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

- All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the schools' safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
- This training will be regularly updated and will:

    - Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
    - Be in line with advice from the 3 safeguarding partners
    - Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- Volunteers will receive appropriate training, if applicable.

16.2 The DSL and deputies

- The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

- At least one person conducting any interview for any post at the Trust will have undertaken safer recruitment training. This will cover, as a minimum, the contents of *Keeping Children Safe in Education*, and will be in line with local safeguarding procedures.

See our Recruitment, Selection and Disclosure policy for more information about our safer recruitment procedures.

16.5 EYFS Staff who have contact with pupils and families

- All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions

of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed at least **annually** in line with any legislative changes or in response to serious incidents by the Designated Safeguarding Leads. At every review, it will be approved by the full governing board.

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- 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
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside school
- If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).
- We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
- A 'case manager' will lead any investigation. This will be the headteacher, or the Chair of Governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
- Our procedures for dealing with allegations will be applied with common sense and judgement.
- If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the Trust so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the Trust so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school in the trust
- If in doubt, the case manager will seek views from the Trust's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

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

deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the Trust is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the Trust and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action within the Trust and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate, such as counselling or from trade union representatives. Staff can seek support from HR and from the school's Employee Assistance Programme helpline 0800 169 1920.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services

and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the Trust is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the Trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the Trust's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the Trust, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Trust will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Trust, while the Trust carries out the investigation
- We will involve the agency fully, but the Trust will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
- When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the Trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the Trust will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the Trust will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching

I**ndividuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the Trust.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the Trust will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate

Shown to be deliberately invented, or malicious, the Trust will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The Trust will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the Trust will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Trust's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the Trust that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the Trust
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the Trust may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

All low-level concerns must be shared with the headteachers or DSLs as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) but it is never too late to share a low-level concern. If the DSLs receive a low-level concern it will immediately be shared with the headteachers. If any low-level concern relates to the behaviour of the headteachers then it should be reported to the Governors.

If the staff member who raises the concern does not wish to be named, then their wishes will be respected as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity cannot be promised to members of staff who share low-level concerns.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the staff code of conduct. Staff in these situations may wish to refer themselves. Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Trust's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's staff code of conduct.

The headteacher will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

(a) speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;

(b) speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

(c) speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);

(d) review the information and determine whether the behaviour (i) is entirely consistent with their staff code of conduct and the law, (ii) constitutes a low-level concern, (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary, (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO/other relevant external agencies, or (v) in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies;

(e) where they are in any doubt whatsoever, seek advice from the LADO - on a no-names basis if necessary;

(f) make appropriate records of:

• all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);

• all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and either on a no-names or names basis);

• their determination (as above);

• the rationale for their decision; and

• any action taken.

The headteacher's approach should also be informed by the following: If it is determined that the behaviour is

entirely consistent with the organisation's staff code of conduct and the law:

(a) it will still be important for the headteacher to update the individual in question and inform them of the action taken as above;

(b) in addition, the headteacher will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation's staff code of conduct and the law;

(c) such a situation may indicate that:

• the staff code of conduct is not clear;

• the briefing and/or training has not been satisfactory; and/or

• the Low-Level Concern information is not clear enough.

If the same or a similar low-level concern is subsequently shared by the same individual, and the behaviour in question is also consistent with the staff code of conduct, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived, if not about the behaviour itself, and/or the implementation of the Low-Level Concern protocol.

If it is determined that the behaviour constitutes a low-level concern:

(a) it should also be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns should be done discreetly and on a need-to-know basis;

(b) most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;

(c) in many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach experienced as critical or threatening (Miller & Rollnick, 1991); a 'values-based conversation' is more likely to be effective, and help maintain a positive professional relationship with the member of staff concerned.

(d) any such conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;

(e) some low-level concerns may also raise issues of misconduct or poor performance. The headteachers should also consider whether this is the case – by referring to the organisation's disciplinary and/or capability procedure and taking advice from HR on a named or no-names basis where necessary. If the headteachers consider that the organisation's disciplinary or capability procedure may be triggered, they should refer the matter to HR. Any such referral should be made by the headteachers having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the headteachers and HR, so that an holistic view of the individual can be taken. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR;

(f) some concerns may trigger disciplinary, grievance or whistleblowing procedures, which should be followed where appropriate. Where low-level concerns are raised which in fact require other internal processes to be followed, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. We will exercise professional judgement and, if in any doubt, seek advice from other external agencies including the LADO;

(g) if HR advise that the organisation's disciplinary procedure is triggered, we will ensure that the individual has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them.

(h) If it is determined that the behaviour:

• whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary, then action (if/as necessary) should be taken in accordance with the LADO's advice; or

• when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation, then it should be referred to the LADO/other relevant external agencies.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Sound professional judgement will be exercised in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern, and their role, will be recorded, as well as the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the latter individual has an opposing factual view of the incident, this will be fairly recorded alongside the concern. The record will include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The electronic record will be signed and dated.

The headteachers or Safeguarding Leads will regularly inform the Governing Board about the implementation of the low-level concerns policy and any evidence as to its effectiveness. For example, by including reference to it in any safeguarding reports, and providing any relevant data.

The Governing Board will also review an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the Trust

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Our local safer schools officer provides advice to our pupils about keeping themselves safe.

Children who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our trust has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded

• 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,

• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSLs or DDSLs will consider referring the pupil concerned into the Cyber Choices programme (a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing which aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.)

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

The DSL will provide support according to the child's needs and update records about their circumstances.

Exploitation

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation –where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

• appear with unexplained gifts, money or new possessions

• associate with other children involved in exploitation

• suffer from changes in emotional well-being

• misuse alcohol and other drugs

• go missing for periods of time or regularly come home late, and

• regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

• have older boyfriends or girlfriends; and

• suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from the school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fcdo.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the Trust's measures to prevent radicalisation are set out in other Trust policies and procedures, including the Online Safety policy and PSHE and RSE policy.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns

- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and gender questioning children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from the school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign in on *Inventry* and wear a visitor's badge.

Visitors to the Trust who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the Trust any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using Trust facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact the parents using all numbers stored on iSAMs. The child will be looked after by staff in the school office until they are safely collected and the incident will be logged. We will report the incident to children's services if required.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Pupils are registered at the start of the school day and any absences are followed up as soon as possible and before first break. We are particularly conscious of pupils who may be vulnerable due to reasons such as past concerns, mental health needs, being on a child in need or child protection plan and those with special educational needs or disabilities. Pupils are also registered in their lessons by their teachers and in afternoon registration. If a child is absent from school without notification of absence having been received, we will contact the parents and if the whereabouts of the child is still unknown, the DSLs will be informed and we will contact the police on 101. We will log the incident on CPOMS.

The information required by the Police to assist in locating and returning the pupil to a safe environment is as follows:

- The pupil's name/s; date of birth; status (for example looked after child); responsible authority;
- Where and when they went missing;
- Previous missing episodes and where they went;
- Who, if anyone, they went missing with;
- What the child was wearing plus any belongings they had with them such as bags, phone etc.;
- Description and recent photo;
- Medical history, if relevant;
- Time and location last seen;
- Circumstances or events around going missing with relevant safeguarding information;
- Details of family, friends and associates.

Whilst the search is ongoing, the school will continue to liaise with the police and act in accordance with police instructions.

1. If the child returns before the Police have arrived, then the Police must be informed, and own school procedures need to be followed.
2. If the child returns to school of their own volition, then the Police must be informed and own school procedures need to be followed.
3. If the police locate the child and bring them back to the school the Police will conduct the safe and wellbeing interview and the school will follow School procedure.
4. Where a pupilhas a known risk of being missing, a risk assessment for the pupil will be written and put in to place.

Any child who is absent from school without explanation will be reported to Children's Services as 'missing in education'. We will be particularly vigilant regarding children not returning to school in September from the summer holidays and ensure all staff are made aware of the issues of forced marriage, female genital mutilation (FGM) and risk of radicalisation.

FRANCIS HOLLAND SCHOOLS
STAFF CODE OF CONDUCT

Introduction

The safety and wellbeing of every pupil at a Francis Holland School is of paramount importance. Every child has the right to grow up and to live in a safe environment. All staff have a duty to protect pupils from abuse and bullying and to promote their wellbeing.

Equally, all staff have the right to be treated with dignity and respect when in the workplace.

Every member of staff should read this code of conduct in conjunction with our Safeguarding and Child Protection Policy and other associated policies. Staff are invited to review this code of conduct annually, and copies are sent to the Governors.

This code of conduct applies to all staff who work for The Francis Holland (Church of England) Schools Trust and aims to set and maintain standards of conduct that we expect all staff to follow. By creating this code of conduct, we aim to ensure our schools are an environment where everyone is safe, happy and treated with respect.

General obligations

Many of the principles in this code of conduct are based on the Teachers' Standards. We expect that all teachers will act in accordance with the personal and professional behaviours set out in the Teachers' Standards.

Staff who work for Francis Holland Schools have an influential position and will act as role models for pupils by consistently demonstrating high standards of behaviour.

We expect all support staff, governors, contractors and volunteers to also act with personal and professional integrity, respecting the safety and wellbeing of others.

In setting an example to our pupils, staff, governors, contractors and volunteers will:

- Maintain high standards in their dress, attendance, behaviour and punctuality
- Never use inappropriate, belittling or offensive language towards pupils or others within our school community
- Treat pupils and colleagues with dignity, respect and professionalism
- Show tolerance and respect for the rights of others, being mindful and respectful of our differences, both visible and invisible
- Not undermine fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- Not express personal beliefs in a way that exploits pupils' vulnerability or might lead them to break the law or that will cause offence or upset to any member of the Francis Holland Schools' community
- Understand the statutory frameworks they must act within
- Adhere to the Teachers' Standards

Failure to follow the code of conduct may result in disciplinary action being taken, as set out in our staff disciplinary procedures.

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, the Trust will use their professional judgement and act in the best interests of the Francis Holland Schools and its pupils and staff.

In line with the statutory safeguarding guidance *Keeping Children Safe in Education 2024*, we have a Staff Acceptable Use Agreement, in addition to this code of conduct, which covers the acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications, including the use of social media.

Please see the Staff Acceptable Use Agreement appropriate for the School.

Promoting awareness

Our curriculum and pastoral systems are designed to foster the spiritual, moral, social, and cultural development of all our pupils. Our staff play a vital role in this process, helping to ensure that our pupils relate well to one another and feel safe and comfortable in school. We expect all staff to lead by example, and to play a full part in promoting an awareness amongst all our pupils on issues relating to health, safety, and wellbeing that is appropriate to their age. All staff working in our schools have an important role in insisting that our pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy. It is unacceptable for staff to be bystanders to discrimination or other negative behaviours.

Time is allocated in PSHE and form time for discussion on what constitutes appropriate behaviour and why bullying and lack of respect for others are never right. Assemblies, Drama and Religious Studies lessons are also used to promote tolerance, mutual respect and understanding. We teach pupils about the unacceptability of bullying and abusive behaviour and promote the safe use of the internet and mobile phones, inside and outside school.

Safeguarding

Staff have a duty to safeguard pupils from harm, and to report any concerns they have. This includes physical, emotional, sexual abuse, and neglect. Staff will familiarise themselves with our Safeguarding and Child Protection policy and procedures, and the Prevent initiative, and ensure they are aware of the processes to follow if they have concerns about a child. Our Safeguarding and Child Protection policy and procedures are available on the Staff Sharepoint pages and on our websites. New staff are shown where to find the policies on arrival as part of their induction.

Allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that anyone working in the school, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed, a child, and/or
- Possibly committed a criminal offence against, or related to, a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children – this includes behaviour taking place inside or outside of school.

We will deal with any such allegation quickly and in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. A case manager will lead any investigation. This will usually be the Head (this may be delegated) or the Chair of Governors where the Head is the subject of the allegation.

Low-level concerns

Low-level concerns are defined as incidents by staff with pupils that do not meet the harm threshold. All low-level concerns must be shared with the Head as soon as reasonably possible and, in any event, within 24 hours of a staff member becoming aware of it (where the concern relates to a particular incident), but it is never too late to share a low-level concern. If the DSLs receive a low-level concern, it will immediately be shared with the Head. If any low-level concern relates to the behaviour of the Head, then it should be reported to the Chair of Governors. For a fuller description of low-level concerns, please refer to the Safeguarding and Child Protection

policy.

Whistleblowing (see also separate Whistleblowing policy in the Employment Manual)

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, they should report it at once to the Head. If there is evidence of criminal activity, the police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in the public interest needs to fear retribution. A member of staff who uses the whistleblowing procedure is entitled to have their name protected from being disclosed by the Head to the alleged perpetrator, without their prior approval. However, it must be recognised that their evidence may be required by the police to be used in any criminal proceedings. There are further details of the whistleblowing procedure in the Employment Manual for staff.

Whistleblowing: Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work that it is 'in the public interest' to report. This may include:

- criminal activity;
- safeguarding concerns following the whistleblowing procedure to raise concerns about poor or unsafe practices at the Trust or potential failures by the Trust or staff to properly fulfil its safeguarding responsibilities;
- failure to comply with any legal or professional obligation or regulatory requirements;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- other unlawful or unethical conduct in the workplace;
- the deliberate concealment of any of the above matters.

Staff/Pupil relationships

- Staff should avoid unnecessary contact with pupils outside school hours;
- Staff should not give pupils their home address, home 'phone number, mobile 'phone number or personal e-mail address;
- Staff should not have pupils as 'friends' or be in direct contact with pupils on social networking sites. They should ensure that they themselves only use a secure setting on such systems;
- Trust staff's social media profiles should not be available to pupils. If they have a personal profile on social media sites, they should not use their full name, as pupils may be able to find them. Staff should consider using a first and middle name instead and set public profiles to private;
- Staff should not attempt to contact pupils or their parents via social media, or any other means in order to develop any sort of relationship. They will not make any efforts to find pupils' or parents' social media profiles;
- Staff will ensure that they do not post any images online that identify children who are pupils at the Trust without their consent;
- Staff should be aware of the Trust's Online Safety policy;
- Staff should not make arrangements to meet pupils, individually, outside school hours other than on school trips authorised by the Head;
- Staff should avoid contacting pupils at home unless this is strictly necessary; they should keep a record of any such occasion;
- Staff should not give a pupil a lift in their own vehicle other than on Trust business and with permission from the Head;
- Staff should take a Trust mobile phone on any residential trip and use only this mobile for any necessary contact with pupils in connection with the trip. Mobile numbers of pupils, parents and any pictures taken should be deleted from the Trust mobile at the end of the trip;

- Pupils are deemed to leave the Trust on 31 August of the calendar year, unless they leave before the end of the academic year in which case they are deemed to have left either on their last day (if mid-term) or on the last day of the holiday before the next term begins. in which they leave. They are deemed not to be pupils after these points.
- Communication with former pupils: the School is aware that as a result of its strong sense of community, former pupils may wish to keep in touch with staff after they leave. This is supported through the FHS Alumni Networks as the Schools wish to support the growth of an ever-stronger community. As a precaution and to protect staff, however, the guidance in this policy also applies to contact with former pupils. To the extent that it is necessary to have contact with former pupils (for example if arranging a careers fair or writing a future reference), staff must use their School email address and ensure that communication always remains professional. Using personal social media and email accounts creates risk of allegations about the abuse of power in a former staff/pupil relationship, or even of a former pupil being groomed. This risk is not time limited and may be alleged at any time. To protect themselves, members of staff must not use their personal social media or email to maintain contact with former pupils of the School. Should any former pupil make personal contact with a member of staff, they must notify the Designated Safeguarding Lead immediately and follow guidance issued to ensure the School email system is used for a professional response.
- Members of staff who are friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside school hours. However, they should still respect the above advice wherever possible and should keep the Head informed of such relationships.
- It is inappropriate for a member of staff to have a sexual or intimate relationship with a pupil of any age and, under section 16 of The Sexual Offences Act 2003, it is an offence for a person aged 18 or over (e.g. teacher) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if they do not teach the child. To have such a relationship even with a pupil over 18 also contravenes the Duty of Care and will result in referral to the relevant authorities.
- While we are aware many pupils and their parents may wish to give gifts to staff, for example, at the end of the school year, gifts from staff to pupils are generally not acceptable. If staff choose to give, for example, their whole class a gift at the end of a course, they should discuss the details with their Head of Department beforehand. It is never appropriate to give a gift to just selected pupils as that would imply favouritism.

Conflicts of interest

On accepting an offer of employment, colleagues have accepted that they are not, and will not put themselves, in a situation where they have a contract or obligation to another person or organisation that will cause a conflict of interest between themselves and Francis Holland Schools (a registered charity) and the other party. All staff need to be mindful of potential conflicts of interest, financial* or non-financial**. Where there might be cause for a possible or potential conflict of interest, this must be raised with the Head in the first instance.

**A financial conflict of interest is one where there is or appears to be opportunity for personal financial gain, financial gain to close relatives or close friends, or where it might be reasonable for another party to take the view that financial benefits might affect that person's actions. Financial interest means anything of monetary value, for example:*

- *payments for goods or services;*
- *awards of contracts;*
- *equity interests (e.g. stocks, stock options or other ownership interests);*
- *resources and assets, including equipment;*
- *intellectual property rights (e.g. patents, copyrights and royalties from such rights).*

***Non-financial interests can also come into conflict, or be perceived to come into conflict, with a person's*

obligations or commitments to Francis Holland Schools or to other bodies, for example examination boards. Such non-financial interest may include any benefit or advantage, including, but not limited to, direct or indirect enhancement of an individual's career, education or gain to immediate family (or a person with whom the person has a close personal relationship).

Protocol in relation to the management of children of staff

We welcome the children of staff as Francis Holland pupils; however, it is essential that the child feels neither advantaged nor disadvantaged by having a parent who works at the school. When personal and professional lives meet, it is essential that there are clear guidelines in place to minimise the potential for any misunderstanding and ensure that the child in question flourishes and the parent or carer in question is enabled to focus on their role as a staff member during the working day. It is also essential that the privacy of staff parents and carers is respected and that they are able to maintain an appropriate balance between their work and private lives. As such, we ask that all staff abide by the following protocol:

Staff parents should not contact school staff during the working day; neither should school staff contact staff parents to talk about their child during the school day. Any communication as regards the child should be as for any other pupil, that is a telephone call made to or from home outside of school hours. An exception may be made in the case of the child of a staff member becoming unwell at school, in which case to avoid distress to the child, the staff parent should be contacted.

A school email address should not be used to communicate to or from staff parents about their child; a separate private email should be used. A note should be made on ISAMS / CPOMS (as appropriate to the school) to denote that a child has a parent who works at the school.

Wherever possible, the staff parent's spouse or partner should be listed as the first point of contact. In such cases, it is acceptable for contact to be made with that parent during the school day.

We would recommend that the staff parent's partner or spouse attends Parents' Evenings with them if they are attending, wherever possible. It is not appropriate for staff parents to seek feedback informally from their colleagues about their child's progress in place of attending Parents' Evenings, or for informal feedback to be given to the staff member about their child.

Staff parents should follow the agreed systems of communication if they wish to talk to school staff about their child, starting with the Form Tutor and then Head of Year.

<u>Confidentiality</u>

Under no circumstances should confidential information about children, their parents or carers be discussed except for between those colleagues who have a professional role in relation to the pupil. Staff parents must exercise discretion at all times with regards to information shared between them and their children. Only if staff children disclose something to their parents which is believed to be a risk to safeguarding, should it be shared at school with the Designated Safeguarding Lead.

Staff parents should exercise particular care when completing work for Francis Holland Trust at home to ensure no personal information about other children is shared. This includes marks for assessed work and similar.

Staff parents should not use ISAMS to check up on their own children and will not have access to their child's details on CPOMS; any issues as regards attendance, conduct, progress or medical issues will be reported to parents as required by the relevant member of staff, in line with school procedures.

Letters to staff parents regarding issues of a sensitive nature should be at the discretion of the Deputy Head Pastoral.

Staff parents should not access school information in order to make personal requests for their own children.

<u>Curriculum and Co-Curriculum</u>

Standard practice will be that wherever possible, staff parents will be timetabled to avoid teaching their own child. It is not appropriate for staff parents to approach Heads of Department to request certain teachers for their children. Any requests for a class or Form move should be objective and addressed to the Head of Year. When teaching or in contact with the children of staff, reference to the fact that the child has a parent working in the school should be avoided, particularly in front of peers. Staff parents should not invigilate an exam that their own child is sitting.

Staff parents should not go on school trips if their child is on the trip. Staff parents should seek advice from the Head if these circumstances arise.

Behaviour management
Staff parents should ensure that they support the school policies and procedures at all times, in particular the Behaviour and Sanctions policy, as would be expected of any other parent.

All pupils, regardless of whether or not they are the children of staff, will be treated fairly.

Staff parents should report any concerns regarding their child to the Head of Year and not attempt to approach individual children or staff themselves to try and resolve situations.

Staff parents should refrain from informally discussing the behaviour of other pupils with their own children.

Language

Staff must not:

- Swear, blaspheme, or use any sort of offensive language in front of pupils.
- Belittle pupils or use sarcasm.
- Make sexual innuendos or any comments of a sexual nature (other than in the context of the curriculum), and should avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc.)
- Be overly familiar in how they speak and act towards pupils.
- Address a pupil by any name other than their first or preferred name.
- Allow pupils to use inappropriate language unchallenged
- Ignore inappropriate chat, but rather positively challenge chat such as racist/sexist comments, swearing or sexual jokes.
- Enter into arguments or heated debates with, or in front of, pupils or parents.

The classroom

Staff should not incorporate in lessons material that is inappropriate or use highly personal information about themselves or others.

Isolation

Wherever possible, staff should avoid being alone in a room with a pupil. Where, for reasons of timetabling, confidentiality or other circumstances, this is not practical, staff should ensure that the door to the room has a glass panel or is left open.

Physical contact (please also see the Safeguarding and Child Protection policy)

Reasonable force:
By law, teaching staff, and other staff who are authorised by the Head to have control or charge of pupils, may use such force or physical contact as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do any of the following:

- Committing a criminal offence;
- Injuring themselves or others;
- Causing damage to property, including their own;

- Engaging in any behaviour prejudicial to good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

This applies when a teacher, or other authorised person, is on Trust premises and when they are in control or in charge of the pupil elsewhere, for example on a field trip or other authorised out of school hours activity. It only applies where no other form of control is available and where it is necessary to intervene. Before intervening physically, a teacher should, wherever practicable, tell the pupil to stop and what will happen if she does not. The member of staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary.

Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Nor should they act in a way that might reasonably be expected to cause injury. The member of staff involved should inform the Head or DSL (reporting as a low-level concern) immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff should provide a written report as soon as possible afterwards.

Action taken in self-defence or in an emergency

The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

Contact in other situations

The law does not cover some other occasions when physical contact may be proper or necessary. Some physical contact may, for example, be necessary to demonstrate exercises or techniques during music or PE lessons or sports coaching, or if a member of staff has to give first aid. In such circumstances the member of staff should first explain the intended action to the pupil. They should not proceed with the action if the pupil appears to be apprehensive or reluctant or if there are other concerns about the pupil's likely reaction. If at all possible staff should ensure that the door is open and, if in any doubt, should ask a colleague or another pupil to be present during the demonstration. Touching may also be appropriate where a pupil is in distress and needs comforting. Staff should use their own professional judgment when they feel a pupil needs this kind of support.

Note: there is no legal definition of “reasonable force”. It will always depend on the circumstances. Note that:

- Physical force is not justified to prevent a pupil from committing a trivial misdemeanour;
- Any force used should always be the minimum needed to achieve the desired result;
- Whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding, and sex of the pupil.

Corporal punishment

Under section 131 of the School Standards and Framework Act (1998), corporal punishment is prohibited for all pupils in independent and maintained schools and it is never used at Francis Holland School.

Photographs and Videos

As stated in the Terms and Conditions, section 6 paragraph 15, parents who do not want their child’s photograph or image to appear in any of the Trust’s promotional material must make sure their child knows this and they complete the Photo Permission form on joining, to that effect. Any subsequent change of decision will require written request to the Head or the School Office. No photos should be taken of any child on the ‘no photo’ list. (Please check with the marketing department for the most up to date list).

Electronic Communication

- Staff will not use Trust technology to view material that is illegal, inappropriate or likely to be deemed offensive. This includes, but is not limited to, sending obscene emails, gambling and viewing pornography or other inappropriate content.
- Staff are permitted to make reasonable use of personal devices and the school's wireless network in school for matters not connected to school work. This use should be appropriate, in staff-only areas and not interfere with the performance of their duties. It is understood that mobile phones may need to be used for emergency (e.g. ambulance, missing pupil, etc.). Staff are not permitted to take photographs of pupils on personal devices or use mobile phones in EYFS areas.
- The EYFS iPod is used for taking photographs of the pupils, as well as for maintaining assessment records through theTapestry EYFS Profiles software.
- We have the right to monitor emails and internet use on the Trust IT system.

Please see the separate Codes of Conduct for further details.

Confidentiality and Data Protection

Staff should respect the privacy of pupils, parents and colleagues and should not pass information about, for example, addresses or telephone numbers to others, without checking first with the person concerned. Lists of pupils'/parents' names and addresses must not be used for any purpose without the consent of the Head. Information about pupils, parents, or colleagues should never be disclosed to telephone enquirers.

Note: Never give an undertaking of confidentiality to a pupil where child protection issues are involved.

Honesty and Integrity

Staff should maintain high standards of honesty and integrity in their role. This includes when dealing with pupils, handling money, claiming expenses and using Trust property and facilities.
Staff will not accept bribes. Gifts that are worth more than £100 must be declared and recorded on the gifts and hospitality register.

Staff will ensure that all information given to the Trust is correct. This should include:

- Background information (including any past or current investigations/cautions related to conduct outside of the Trust);
- Qualifications;
- Professional experience.

Where there are any updates to the information provided to the Trust, the member of staff will advise the Trust as such as soon as reasonably practicable. Consideration will then be given to the nature and circumstances of the matter and whether this may have an impact on the member of staff's employment.

Staff will not act in a way outside of work that would bring the Trust, or the teaching profession, into disrepute. This covers conduct including but not limited to relevant criminal offences, such as violence or sexual misconduct, as well as negative comments about the Trust on social media.

Recording Conversations

It is strictly forbidden for a member of staff to make a recording of any conversation with another member of staff, a pupil, parent or contractor, whether in person, online or on the telephone, without the express permission of all those present. Breach of this policy may be considered gross misconduct.

Consequences of breaching this policy

It is a contractual requirement as well as in your interests to follow this Code so as to maintain appropriate standards of behaviour and your own professional reputation. A breach of this Code may be treated as misconduct and will render you liable to disciplinary action including in serious cases, dismissal. Further details are contained in the Disciplinary Procedure.

Links with other policies

This policy links with our policies on:

- Staff Disciplinary procedures, which will be used if staff breach this code of conduct. Our disciplinary procedures also set out examples of what we will deem misconduct/ gross misconduct
- Staff Grievance procedures
- Dignity at Work Policy
- Safeguarding and Child Protection
- Anti-Bribery
- Online Safety
- Whistleblowing