



## Bancroft's School

### Safeguarding (Child Protection) Policy

Updated September 2018

In this policy there is a distinction made between the use of 'must' and 'should'. 'Must' indicates a legal/ statutory duty and 'should' means 'should do unless there is a really good reason not to.

We have a special responsibility to safeguard pupils who are entrusted to our care and to protect them from harm. The Safeguarding Policy has been developed to be in accordance with local multi-agency safeguarding arrangements (Tel: 020 8708 3885) and has regard to:

- [London Safeguarding Children's Board Procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Child Sexual Exploitation with Annexes February 2017](#)
- [What to Do If You are Worried a Child is Being Abused 2015](#)
- [Keeping Children Safe in Education Department for Education September 2018 \(KCSIE\)](#)
- [Prevent Duty Guidance: for England and Wales 2015](#)
- [The Prevent Duty departmental advice for Schools and Childcare providers 2015](#)
- [The use of Social Media for online radicalisation 2015](#)
- [Mandatory Reporting of FGM – procedural information 2015](#)
- [Educate against Hate](#)
- [Metropolitan Police – Know the facts](#)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges 2018](#)

The policy is available to parents on the school website. The policy is reviewed annually; any weaknesses or deficiencies will be remedied without delay. The annual review includes an update and review of procedures and their implementation.

We work within a legislative framework that seeks to safeguard and promote the welfare of all children. We are fully committed to the principles of the Every Child Matters agenda and

aim to achieve best practice in all areas of safeguarding. Fundamental to this aim is the creation of a culture of openness throughout the school where all members of the community feel able to raise concerns, confident that they will receive a serious, sensitive and professional response from those in positions of responsibility. Underlying this is an attitude that “it could happen here” where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child. Safeguarding and promoting the welfare of children can be defined for these purposes as; protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The Head has nominated the Assistant Head Pastoral, Elizabeth Channer (Tel 020 8505 4821 x8130, [elizabeth.channer@bancrofts.org](mailto:elizabeth.channer@bancrofts.org)), to be the Designated Safeguarding Lead (a detailed job description for the Assistant Head Pastoral, including her role as DSL can be found [here](#)) in the Senior School and the Assistant Head Operational & Pastoral, Lisa Life (Tel 020 8506 6751, [lisa.life@bancrofts.org](mailto:lisa.life@bancrofts.org)), to be the Designated Safeguarding Lead of Bancroft’s Prep. The key activities of the role are outlined in the job description. The school will ensure that the Designated Safeguarding Leads are given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively. Regular review of the Designated Safeguarding Lead will ensure that professional practice improves over time. The staff will be reminded of their roles at the beginning of each academic year. The DSLs report annually to the Governors on safeguarding issues. Their reports are minuted. The Head of Learning Support, Antonia Fryer-Green (Tel 020 8505 4821 x8111 [antonia.fryer-green@bancrofts.org](mailto:antonia.fryer-green@bancrofts.org)), is the Deputy Designated Safeguarding Lead in the Senior School. All members of the Senior Leadership Team and Housemasters and Junior Housemistresses have also been Level Three Safeguarding trained. The Head of Prep School, Joe Layburn (020 8506 6751 [joe.layburn@bancrofts.org](mailto:joe.layburn@bancrofts.org)), and Beta Year Group Leader, Laura Dalton (020 8506 6751 [laura.dalton@bancrofts.org](mailto:laura.dalton@bancrofts.org)), are the Deputy Designated Safeguarding Leads in the Prep School and have also received appropriate training.

A member of the Governing Body, Michael Stark (Senior School) and Professor Peter Kopelman (Prep School), is responsible for scrutinising safeguarding policy, practice and the efficiency with which safeguarding duties have been discharged. They interview staff and pupils and meet with the Designated Safeguarding Leads termly. They report to the Governing Body. The Governing Body is fully aware that safeguarding policies and implementation are the responsibility of all Governors. This will be fully reflected in detailed minutes of all Governing Body meetings.

## **EARLY HELP AND EMERGENCY ACTION**

All staff should be aware of the early help process, and understand their role in it. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is frequently missing/goes missing from care or home;
- is misusing drugs or alcohol;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; and/or
- has returned home to their family from care.

If early help is appropriate, the Designated Safeguarding Lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. In such cases, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving. In the event of any Safeguarding/Child Protection concerns, every effort should be made by staff to contact the DSL in the first instance to avoid any undue delay. In cases of emergency, a referral can be made directly by the person concerned. Parental consent is not required for referrals to statutory agencies.

### **WHISTLEBLOWING ON SAFEGUARDING/CHILD PROTECTION MATTERS**

Staff or volunteers who feel concerned about poor or unsafe practice and potential failures in the school's safeguarding regime should feel able to report these to the Senior Leadership Team. Such concerns will be taken seriously and a member of the Senior Leadership Team appointed to investigate such concerns reporting back to the Head/Head of the Prep School, the Chair of Governors and the respective member of the Governing Body.

Staff or volunteers' concerns will have regard to the school Whistleblowing policy which can be found in the Staff Employment Manual which is sent electronically to all staff. Where a staff member feels unable to raise an issue with the Senior Leadership Team or feels that genuine concerns are not being addressed, other whistleblowing channels may be open to them. General guidance can be found at – [Advice on whistleblowing](#). Additionally, the NSPCC [whistleblowing helpline](#) is also available for staff who feel unable to raise concerns internally. Staff may call 0800 028 0285 (8am to 8pm Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or write to NSPCC, Weston House, 42 Curtain Road, London, EC2A 3NH.

## **SAFER RECRUITMENT**

The Chairman & Deputy Chair of the Governors, the Human Resources Officer, some members of the Senior Leadership Team, and others involved in the appointment of staff in the Senior School and Prep School have been trained in Safer Recruitment.

The Human Resources Officer ensures that DBS and other pre-appointment checks are carried out and procedures comply with current legislation, Independent Schools Standards Regulations. (See **Safer Recruitment Policy** document). This includes staff, supply staff, volunteers, staff of contractors and other individuals who are not staff or supply staff.

## **Recruitment Policy**

Bancroft's School is committed to safeguarding the welfare of children and promoting the welfare of children and young people. All appointments follow the statutory guidance given in 'Keeping Children Safe in Education' (2018).

In order to ensure that we appoint the most suitable staff we use the following procedure.

1. A clear post and person specification is defined which sets down the boundaries and expectations of the role including a statement of responsibility and requirements for safeguarding.
2. Any advertisement includes:
  - a) The wording:
  - b) Details about the School
  - c) Details about the post
  - d) Qualifications required for the post (e.g. graduate if a teaching post)
  - e) Applicants must complete the application form
  - f) Closing date
3. Application forms are carefully scrutinised by at least two people, applying the same criteria from the post and person specification to each applicant, and a shortlist drawn up.

4. References (at least two) are sought for the short-listed candidates. In cases where the candidate has worked with children, at least one of the references must be provided by that institution. One must be a professional reference (ideally from the candidate's ultimate manager at current / last place of employment) and this must request:
  - i. The applicant's dates of employment and job title/duties.
  - ii. Whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired).
  - iii. Whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people.

References need to be signed but any references sent by email (if signed and scanned or not) must be confirmed by telephoning the referee. References can be taken over the telephone but the key details need to be noted, dated, timed and signed.

#### 5. Interview:

The interview panel includes at least one person who has completed Safer Recruitment Training. Where there is not a panel, the person interviewing must have completed the training.

Candidates are required to provide documents at interview so that checks can be made of identity, address and the right to work in the UK (passport and / or driving licence or if the candidate does not have either or both, other appropriate documentation). One document must provide photographic identity.

The interview panel explores the applicant's suitability for working with children as well as for the post. All candidates are asked a set of standard questions and their answers are recorded and held centrally by HR.

The candidate will be required to answer specific safeguarding questions and a statement, signed by the interviewer, will be held by HR.

The candidate is asked if they wish to declare anything in the light of the requirement for an Enhanced DBS check.

Any gaps in employment history are explained.

If the applicant submitted their application form via e-mail – they will be asked to sign the document.

6. The interview panel meets and decides on the successful candidate.
7. An offer of employment is made for a probationary period conditional on satisfactory completion of the following pre-appointment checks:
  - a) Identity (including right to work).
  - b) References (if not already obtained previously).
  - c) Qualifications (if not verified on the day of interview).
  - d) Enhanced DBS check as well as barred list and prohibition from teaching check. This includes for all management positions (Heads of Department and above in both teaching and non-teaching, including Governors) a check to see if the applicant has been barred by the Secretary of State from taking part in the management of an independent school under section 128 provisions. This may be done through the DBS barred list checking process which now includes bars from taking part in management, except when the individual is not in a regulated activity, in which case the NCTL prohibitions list must be used instead.
  - e) The completion of a medical health check form, including the provision of the name and address of the candidate's medical practitioner. Pursuant to Section 60 of the Equality Act 2010 the applicant may be asked relevant questions about their disability and health in order to establish whether they have the physical and mental capacity for the specific role.
  - f) Overseas checks
  - g) Prohibition checks – teaching, and leadership/management.
  - h) Additional checks on people who have lived or worked outside of the UK; this would include recording checks for those European Economic Area (EEA) teacher sanctions and restrictions. (para 114 KCSIE 2018).

Teacher prohibition orders prevent a person from carrying out teaching work in schools, sixth form colleges, 16 to 19 academies, relevant youth accommodation and children's homes in England. A person who is prohibited from teaching must not be appointed to work as a teacher in such a setting. A check of any prohibition can be carried out using the Teacher Services' system. It should also be used to verify the award of qualified teacher status (QTS) and the completion of induction or probation.

Any person subject to a Section 128 direction will not be allowed to take any part in the management of the School, be it as a governor, Head, member of SLT or Head of Department.

If all conditions are successfully completed to the satisfaction of the School, an offer letter will be issued.

If there is any delay in receiving the Enhanced DBS certificate the member of staff may be allowed to begin work following a Barred List check. Appropriate supervision must be in place and a risk assessment carried out.

Governors must receive enhanced DBS clearance before being appointed.

Non-teaching and teaching staff, whether part-time or full-time, follow the same procedure.

The recruitment of peripatetic music teachers or sports coaches (self-employed or not) follows the same procedure as described above.

The recruitment of (new) volunteers who have regular contact with children, unsupervised or not, must include a DBS check, references, an informal interview and there should not be any contrary indications from anyone in the school. These volunteers will also be included in the Central Register.

Volunteers with unsupervised contact (so-called ‘regulated activity’) with children or accompanying a school party overnight must have an enhanced DBS check.

The completion of recruitment of new governors requires an enhanced DBS check and a check of identity and the right to work in the UK.

For staff and volunteers (including governors) being recruited from overseas (including UK nationals returning to work in the UK) the same procedures above are followed but more stringently. The equivalent police checks (of criminal records) in the country concerned and / or certificates of good conduct from the appropriate authority will be sought. Extra references will be requested when the latter cannot be obtained.

**It is mandatory that hard copy evidence of all checking is placed in the personnel files.**

On taking up their post all newly appointed staff will be given an induction from the Designated Safeguarding Lead.

## **CONTRACTORS**

All contractors are signed in to the school reception and met by the department organising the visit. Those that do not make regular visits and therefore have not signed a “contractors’ safeguarding agreement” with the school will be issued with a red lanyard and visitors badge and escorted throughout their visit to the school. Those that do make regular visits are invited to sign a “Contractors’ Safeguarding Agreement” which commits them to making the same checks on their named staff as Bancroft’s School would complete for their central register. In such cases these named staff are signed in and issued with a blue lanyard and visitors badge, which entitles them to unescorted access to the school site.

## **HOMESTAY / EXCHANGE VISITS**

When foreign pupils visit the school for the purpose of a homestay / exchange, the host parents will need to have an enhanced DBS check as they will be in regulated activity

(unsupervised contact) with the child. The DBS service will process these checks without charge because the parents are volunteers.

## TRAINING – INDUCTION AND ONGOING

All staff (leaders and those who work directly with children) employed in July 2016 were asked to read and confirm in writing (either electronically or otherwise) that they had read and understood Part 1 and Annex A of KCSIE. The Senior Deputy Head of the Senior School, Head of the Prep School and HR keep a list of these staff. Staff recruited subsequent to September 2018 are asked to confirm that they have read and understood Part 1 and Annex A of KCSIE 2018 and the school Safeguarding Policy. The latter includes, in the form of Appendix A, Staff Code of Conduct: acceptable use of ICT, staff/pupil relationships and communications (including use of social media) as part of the induction process. New staff induction training will contain updates online with local multi-agency safeguarding advice to include Prevent and Online Safety Training. Further Prevent information is also available on the VLE. All staff employed in May 2014 were asked to read the first iteration of KCSIE (2014), Part One, and to confirm that they had done so. This exercise was repeated in May 2015, in 2016 with regard to KCSIE 2016 and again in August 2018 with regard to KCSIE 2018.

During their induction, governors, new staff, including part time, temporary, non-teaching staff, student teachers and volunteers are given training about safeguarding and receive electronically the Staff Employment Manual which contains the Whistleblowing Policy. This includes familiarisation with the school's Child Protection Policy, the Staff Code of Conduct and the identity of both the Designated Safeguarding Lead and the Deputy. A copy of Part 1 and Annex A of KCSIE 2018 is distributed to all new staff as part of their induction pack and they are required to confirm that they have read and understood this. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

New teaching staff and others who have contact with children are also given online training endorsed by the NSPCC unless they have evidence of appropriate training within the last three years.

Child Protection training is updated for the Head, all teaching staff, non-teaching staff and volunteers who work with children yearly, in line with advice from the LSCB. Training is provided by the Designated Safeguarding Lead who has up to date inter-agency training or by the Safeguarding Officer for Redbridge or by an agency acceptable to the LSCB. In addition, all staff members are informed via email and the VLE of any changes made to policies pertaining to the safeguarding of children to provide them with the relevant skills and knowledge to safeguard children effectively.

The Designated Safeguarding Leads and their deputies attend training at least every year in Child Protection and inter-agency working to keep up with any developments relevant to their role. Training is provided by the Safeguarding Officer for Redbridge or by an agency acceptable to local multi-agency safeguarding arrangements. The training covers inter-agency working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children.

On an annual basis the Designated Safeguarding Lead undertakes refresher training for all staff reminding them of who she and her deputies are and the procedures to follow in cases of disclosure by a pupil. In addition they are informed of any relevant safeguarding and child protection developments. Staff are all issued with a credit card style aide memoire, which is colour coded to indicate the appropriate iteration. Staff are asked annually to confirm that they have re-read the Safeguarding Policy, which includes the Child Protection Policy, Staff Code of Conduct (referred to sometimes as the Staff Behaviour Policy) and information regarding the role of the Designated Safeguarding Lead.

Through the PSHE programme the School ensures all pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum.

#### **PROVIDING A SAFE AND CARING ENVIRONMENT**

Staff are encouraged to pay attention to safeguarding issues in the widest sense and in all areas of school life e.g. risk assessments for activities off site, preventing rough play, reporting hazards to the Deputy Bursar. Health and safety documentation reflects the consideration given to protecting pupils.

Pupils are familiar with emergency evacuation procedures/fire drills.

The School boundaries have been made as secure as possible.

Prep pupils and pupils in the first three years of the Senior School must remain on the school site during the school day unless they have permission to leave. Older pupils may leave the site during lunchtime. They must sign out when they depart and sign in when they return. The school has a separate policy for Missing Pupils.

Registration procedures monitor the whereabouts of pupils and contact is made with parents on the first day of absence if the reason for absence is unknown. Prolonged, unexplained absence could be a sign of abuse or neglect. Staff should be on the lookout for patterns of absence and report these to the Junior Housemistress/Senior Housemaster or in the Prep School the Phase Leaders.

All visitors must report to the School Office. Visitors' red lanyards are issued. A signing in and out system is operated for visitors. Staff are asked to be vigilant at all times and to challenge

strangers. Any concerns are to be reported to the Bursar's Office or caretaker immediately. Photographs are displayed of all teachers to aid identification.

Parents visiting the school to watch fixtures will report to reception or the cricket pavilion where they will be given an orange lanyard identifying them as a sports visitor. Access to the main parts of the school will remain prohibited.

All staff have been issued with photographic ID which must be on display at all times on the school site.

There are regular patrols by the duty member of staff. A member of Senior Leadership Team is on duty until the school closes at 6pm (5.45pm in the Prep School) to deal with emergencies. Pupils can contact the member of staff on duty by going to the Library or Prep Office in case of the Prep School.

CCTV promotes security.

Personal safety is addressed in the PSHE programme, including internet safety.

Pupils are given opportunities in PSHE, and in other areas of the curriculum, to develop an understanding of what constitutes unacceptable behaviour on the part of others and the nature of abuse. This includes an explanation of the legal age of consent. Pupils are informed about sources of help and advice e.g. school calendar, pupil planner, notice boards.

Through the curriculum and co-curricular activities, pupils are given opportunities to gain knowledge, develop confidence and assertiveness which equips them to protect themselves from harm.

As part of their training Senior School, prefects are told to involve staff if a younger pupil appears to be at risk in any way.

Bullying and aggressive behaviour are not tolerated (see [Anti-Bullying Policy](#)). A bullying incident is treated as a Child Protection concern when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. In such cases concerns are reported to the local authority social care department. Every effort is made to set expectations of acceptable behaviour and to encourage open relationships amongst, and between, pupils, staff and parents. To allow or condone bullying may lead to consideration under child protection procedures. Pupils have the right to say what they think about anything which affects them; what they say must be listened to carefully. The School pastoral system and the School Council promote this principle.

Staff are reminded that they should remain on the lookout for children that may benefit from early help. In such instances staff should speak to the Designated Safeguarding Lead immediately.

## **EXTERNAL VISITS**

Assurance is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site (for example in a separate institution) – for more details see [Trips & Educational Visits Health and Safety Policy](#).

## **INCIDENTS IN THE SCHOOL NEIGHBOURHOOD – WARNING SYSTEM**

If a pupil reports an indecent assault, unpleasant approaches or suspicious behaviour in the vicinity of the school, the police should be informed by the Designated Safeguarding Lead, the Senior Deputy Head or in their absence, another member of the Senior Leadership Team. If the police issue a warning to the School, details are e-mailed to staff. Pupils are put on their guard by teachers, tutors or in an assembly, without causing unnecessary alarm. Parents are warned through email.

## **CATEGORIES OF ABUSE**

The four main categories are: physical, sexual, emotional abuse and neglect. Abuse can happen at home, at school, or elsewhere and can be inflicted by an adult or another child. Staff should remember that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition of label. In most cases multiple issues will overlap with one another.

As part of safeguarding training staff are made aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment and sexting. See Allegations Against Pupils/ Peer-on-Peer Abuse on [page 16](#) of this document.

## **SUSPICION OF ABUSE OR NEGLECT**

If no allegation has been made, but a member of staff suspects that a child may have been abused (e.g. an injury) or neglected, the member of staff must pass on their concern to the Designated Safeguarding Lead. If a member of staff suspects that a crime may have been committed, **their concerns must be reported to the police immediately**.

## **DISCLOSURE OF ABUSE AND REPORTING**

Procedures to be followed by a member of staff if an allegation of abuse is made are to be found in the Guidance for Staff ([What To Do if a Child Makes an Allegation of Abuse](#)). The same procedures apply if a third party, including other children, makes an allegation.

Members of staff must report an allegation of abuse to the appropriate Designated Safeguarding Lead. In their absence members of staff report to the appropriate Deputy

Designated Safeguarding Lead, the Head of the Senior School or another member of the Senior Leadership Team. **This must be done within 24 hours and preferably on the day concerned.** Children who have suffered or are at risk of suffering serious harm are immediately referred to children's social care team or in cases of emergency, the police. Listening to an abused child is a distressing experience and the member of staff will be given support. Details should not be related to more people than is absolutely necessary. If the Head of the Senior School is not informed in the first instance, details of the incident will be reported to him as soon as possible.

Whilst the Data Protection Act 1998 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information **cannot** be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

## FURTHER ACTION

The Head of the Senior School, in consultation with the Designated Safeguarding Lead and relevant senior colleagues will report immediately to the Local Authority Designated Officer (LADO) and Child Protection Assessment Team any signs of abuse. The child's best interests will be of paramount importance when decisions are made. In such delicate circumstances staff involved will, of course, proceed with utmost sensitivity. Local multi-agency safeguarding guidelines are followed regarding thresholds for referrals and care is taken not to impose high thresholds. **The Head and the Designated Safeguarding Lead will not make their own decision over what appear to be borderline cases.** Doubts and concerns will be discussed with the Child Protection Assessment Team or LADO. This may be done tentatively and without giving names in the first instance. **What appears minor at first could later be revealed to be much more serious and an allegation of child abuse or neglect may lead to a criminal investigation.** The school recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

The responsibility for further investigation lies with the LADO and not with the School. The Designated Safeguarding Lead maintains contact with LADO and their team and will make a referral within 24 hours. The LADO will be consulted to establish whether parents can be informed. This may not be permitted if to do so would put the pupil at greater risk or impede a criminal investigation. The Designated Safeguarding Lead is not at liberty to provide detailed feedback. The member of staff who reported the allegation may therefore be unaware of the measures taken to safeguard the child. It should not be assumed that the matter has not been taken seriously.

If a member of staff has grounds to believe that their reported concerns have not been acted upon appropriately he or she should contact the LADO directly.

When concerns about a pupil are raised but the decision is made not to make a referral to the LADO a record is kept giving reasons for the decision.

## **ALLEGATIONS OF ABUSE AGAINST STAFF, THE DESIGNATED SAFEGUARDING LEAD, VOLUNTEERS OR THE HEAD**

(To be read in conjunction with the Staff Disciplinary Procedure)

Procedures will be applied with common sense and judgement.

Guidance will be taken from Part 4 of [KCSIE](#) which replaces Dealing with an Allegation of Abuse against Teachers and Other Staff (revised Oct 2012).

Allegations against staff, volunteers or the Designated Safeguarding Lead will be reported immediately to the Head of the whole school. If the Head is absent, the allegation will be passed to the Chairman of the Governors, who can be contacted at [chairman@bancrofts.org](mailto:chairman@bancrofts.org). The Designated Safeguarding Lead, will also be contacted (unless they are the object of the allegation), since the Designated Safeguarding Lead has received higher level safeguarding training. If the Designated Safeguarding Lead is the subject of an allegation, the Deputy Designated Safeguarding Lead in the appropriate school, will be contacted along with the Head so as to avoid any undue delay. The Designated Safeguarding Lead will then work with the "Case Manager" and the designated officers for child protection concerns.

If the allegation concerns the Head, or if the Head is absent, the person receiving the allegation should immediately inform the Chairman of the Governors without notifying the Head at the email address above.

So as not to jeopardise a statutory investigation, the investigation of allegations will not be undertaken without prior consultation with the LADO for Redbridge. In borderline cases, discussions with the LADO can be held informally, without naming the school or the individual. Referrals to the LADO will be made within one working day. Discussion with the LADO will consider the nature of the allegation, the content and context of the allegation and a course of action will be agreed, including any involvement with the police. Discussions will be recorded in writing and communication with both the individual and the parents of the child/children agreed.

### **Redbridge LADO:**

Redbridge LADO Tel: **020 8708 5350**

If you have a concern about a child and would like to seek advice regarding child abuse or neglect please contact the Child Protection Assessment Team (CPAT).

Referrals can be sent to [cpat.referrals@redbridge.gov.uk](mailto:cpat.referrals@redbridge.gov.uk)

Tel: **020 8708 3885** (9.00am to 5.00pm) or **020 8708 5897** (after 5.00pm)

Lynton House, 255-259 High Road, Ilford, Essex, IG1 1NN

**Waltham Forest LADO:**

Waltham Forest LADO Tel: **020 8496 3646 / 07791 559 789** or **020 8496 8276 / 07854 238 759**

**Essex LADO:**

Children's Safeguarding Service **03330 139 797**

[childrens.safeguarding@essex.gov.uk](mailto:childrens.safeguarding@essex.gov.uk)

**Newham LADO:**

Newham LADO Tel: **020 3373 3803**

In cases of serious harm the police should be informed from the outset.

All cases will be treated with the greatest discretion. At any stage of consideration or investigation, all unnecessary delays will be eradicated. The speedy resolution of allegations is a priority, benefitting all concerned.

The Head and Prep School Head will do everything in their power to protect the member of staff from mistaken, malicious or frivolous accusations. Allegations found to be malicious will be removed from records and will not be referred to in employer references. Records will be kept of all other allegations, but any that are not substantiated or unfounded will not be referred to in employer references.

The Head/Prep School Head may have to consider whether suspension is appropriate. The Head/Prep School Head is not obliged to suspend a teacher immediately or automatically if an allegation has been made; he is free to use his professional judgement in the light of the nature of the accusation. He will give due weight to the views of the LADO and the Staff Disciplinary Procedure when making a decision about suspension. He would normally take steps to ensure that the child and the teacher were not in contact during the period of the investigation (see **Staff Disciplinary Procedure**).

If the Head/Prep School Head exercises his right to suspend a teacher (see **Staff Disciplinary Procedure**), the period of suspension will be as short as is reasonably possible to ensure a proper investigation of the allegation. Such suspension is a neutral act and would be without prejudice. The Chairman of the Governors would be informed.

Support/counselling for the teacher, during the period of suspension, would be offered.

If gross professional misconduct is proved to the satisfaction of the Head/Prep School Head, he (after consultation with the Prep School Head, in cases related to Prep School staff) has power, after consultation with the Chairman of the Governors, to dismiss the teacher without

previous warnings and without notice. He will inform the teacher of his/her right to appeal to the governing body.

If the Head's/Prep School Head's investigation reveals misguided, ill-judged or unprofessional conduct, he will determine the appropriate course of action and advise the member of staff of the action he is taking.

The school will make every effort to maintain confidentiality and guard against unwanted publicity in accordance with restrictions which were put into place 1 October 2012 regarding the reporting or publishing of allegations against teachers. The school is aware that these restrictions apply up to the point where the accused person is charged with an offence, or the DfE/NCTL publish information about an investigation or decision in a disciplinary case.

The Head/Prep School Head will report to the Disclosure and Barring Service promptly any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children and the DBS criteria are met. [customerservices@dbs.gsi.gov.uk](mailto:customerservices@dbs.gsi.gov.uk)

Tel: 0870 909 0811 DBS PO Box 181, Darlington, DL1 9FA Tel: (for referrals) 01325 953 795)

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. The report will include as much evidence about the case as possible. Legislation contained in The Education (Provision of Information by Independent Schools) (England) Regulations 2003 will be adhered to. Compromise agreements will not apply in this connection or where the individual refuses to co-operate with an investigation.

The Head/Prep School Head recognise that they have a duty to consider making a referral to the [National College for Teaching and Leadership](http://www.education.gov.uk/nationalcollege/index/about-us/contact-us.htm) (<http://www.education.gov.uk/nationalcollege/index/about-us/contact-us.htm>) (NCTL) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or, a "conviction, at any time, for a relevant offence." The Head/Prep School Head will seek guidance from the NCTL when considering a referral. Where, a referral has been made to the DBS, it is necessary for a referral also to be made to the NCTL, as information is not shared between the two bodies. However, where a dismissal does not reach the threshold for DBS referral, separate consideration will be given to an NCTL referral as soon as is allowable under the regulations. Failure to make a disclosure is an offence.

The Head/Prep School Head will inform the child and the child's parents of developments as appropriate.

If there has been a substantial allegation against a member of staff, the school will work with the LADO to determine whether there are any improvements to be made to procedures or practice to help prevent similar events in the future.

### **ALLEGATIONS AGAINST PUPILS / PEER-ON-PEER ABUSE**

The following procedures apply for dealing with abuse by one or more pupils when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. This may take the form of peer on peer abuse, including sexual violence and sexual harassment and in particular reflect the different gender issues that are often prevalent when dealing with peer on peer abuse. This could, for example, include girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence.

A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation and the school's policy on behaviour, discipline and sanctions will apply. The school will take advice from the Redbridge Child Protection Assessment Team on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Child Protection Assessment Team, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. Details of peer-on-peer abuse cases will be kept by the Senior Tutor as part of his bullying log.

It is important to emphasise that abuse, be it peer-on-peer or any other kind, should never be tolerated or passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" and that behaviours which are potentially criminal in nature will be challenged. Dismissing such behaviours risks normalising them. Peer-on-peer abuse can take many forms, including: bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair-pulling, or otherwise causing physical harm. Sexting and initiating/hazing type violence and rituals are also included. Peer-on-peer abuse is often gendered in nature (and more likely that girls will be victims and boys perpetrators), but **all** peer on peer abuse is unacceptable and will be taken seriously.

If a child has been harmed, is in immediate danger or at risk of harm, a referral should be made to children's social care and reports of rape should be passed to the police.

If a disclosure of peer-on peer abuse is made to a member of staff, the same steps should be followed as for any other safeguarding concern. Staff must not promise confidentiality and must act quickly, ensuring that the child is safe, taking him/her to the DSL, Deputy DSL or

member of SLT rather than sending him or her back to class where further distress might be caused.

The School strives to create a culture of listening so that pupils are able to speak out when they have a concern and the response to boy on boy, boy on girl and girl on girl sexual violence and harassment is robust. Through our behaviour policy, PSHE and tutor time we aim to foster healthy and respectful relationships between boys and girls and pupils in general.

Following a disclosure of peer-on-peer abuse, the wishes of the victim will be considered; they should be given as much control as reasonably possible.

The immediate consideration would be how to support and protect the victim but also the alleged perpetrator (if this were one of our own pupils). The alleged perpetrator would be removed from any classes shared with the victim and the two would be kept apart while in school. This should not be perceived as a judgement on the guilt of the alleged perpetrator, but as reasonable steps in the best interests of both children.

Other factors which would need to be considered are: the ages and developmental stages of the children involved, and power imbalance between the children, whether the incident is a one off or part of a sustained pattern of abuse and whether there are ongoing risks ('contextual safeguarding').

In the eyes of the law, a child under 13 can never consent to any sexual activity; the age of consent is 16; sexual intercourse without consent is rape; creating and sharing sexual photos and videos of under 18s - sexting - is illegal and this includes children making and sharing sexual images and videos of themselves.

Sexual violence and harassment are never acceptable and will not be tolerated.

## **INTER-AGENCY COLLABORATION**

The school works closely with Children's Services, the police and health professionals and participates in case conferences. Children who have suffered or are at risk of suffering serious harm are immediately referred to children's social care. Those who are in need of additional support are referred to the appropriate agency such as CAMHS or inter agency assessment using local processes, including the 'Common Assessment Framework' (CAF) and 'Team around the Child' (TAC) approaches.

If a pupil is subject to a Child Protection Plan confidential and secure records are kept separate from the main file in line with Redbridge policy. An indication of further record keeping is kept in the main file. Staff are informed about safeguarding and other sensitive pastoral issues on a need to know basis. Our aim is to find a balance between respecting confidentiality and providing colleagues with sufficient information to fulfil their role responsibly.

Absence of more than two days, without satisfactory explanation, of a pupil who is subject to a Child Protection Plan is referred to the social worker.

We understand that a pupil who has suffered abuse or neglect or who has witnessed violence or lives in a violent environment may feel helpless and humiliated, may find it difficult to develop a sense of self-worth. They may blame themselves. They may display challenging behaviour or may appear withdrawn.

Every effort will be made to support pupils who have experienced abuse or neglect of any kind. The school seeks to provide a stable and secure environment and create opportunities to build resilience and a sense of self-worth. Arrangements are made for ongoing support if the pupil moves to a new school. Records are forwarded under confidential cover to the Head of the new school.

The school will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority. The Designated Safeguarding Lead will provide staff with relevant information about the child's status, contact arrangement with parents, care arrangements and delegated authority to carers.

## **PHOTOGRAPHS AND IMAGES OF PUPILS**

It is the custom and practice of most independent schools to include some photographs or images of pupils, often with names, in the school's promotional material in printed and electronic media such as the prospectus, website and newspapers. Photos for external publication will be discussed with the pupils or parents (as appropriate based on their age and capacity to consent) and specific consent obtained in advance of publication. We will not disclose the address of any child without their parents' consent. Parents who do not want their child's photograph or name to appear in any of the school's promotional material must make sure their child knows this and notify the Head/Prep School Head immediately.

## **GUIDANCE FOR STAFF**

### **Signs and Indicators of Abuse**

Lists of signs and symptoms are not fail-safe mechanisms, but they are often helpful indicators in certain combinations of the likelihood or reality of abuse. Children may behave strangely or appear unhappy for many reasons, as they move through the inevitable stages of growing up, and their families experience changes.

Staff should be alert to concerns such as children who run away or go missing, Female Genital Mutilation (FGM), and Child Sexual Exploitation. Below are lists of some of the signs and types of behaviour, which may indicate that a child is being abused. In themselves they are not evidence of abuse, but they may suggest abuse if a child exhibits several of them or if a pattern emerges. Remember that there can be other explanations for a child showing such signs or behaviour in such ways. There is a good deal of overlap between the signs and symptoms of the different types of abuse, particularly between emotional and other types of abuse.

## **Types of abuse and neglect**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults **or another child or children.**

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another (domestic violence). It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

**Neglect:** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure

access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Honour based violence (HBV):** HBV denotes crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation, forced marriage and breast ironing. All forms of HBV are abuse and must be reported to the relevant agencies, with support from the DSL where appropriate.

**Peer Abuse:** Peer abuse can occur in all of these categories and is most likely to include, but not limited to, bullying (including cyber-bullying), gender based violence, sexual assaults and sexting. Peer abuse is dealt with under '[Allegations against Pupils](#)' on page 16 of this document. The School is aware that there is a fine line between behaviour that might be termed "banter" and behaviour that actually constitutes peer abuse. The school treats all such behaviour very seriously and where behaviour might be correctly construed as "banter", such behaviour will be dealt with according to our '[Anti Bullying Policy](#)'. In determining the line between banter as 'peer abuse' and banter as 'bullying' the school will pay regard to intention, action, frequency, severity and most particularly, the impact upon the victim.

**Children Missing from Education:** A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. Staff must follow school procedures for unauthorised absence and for dealing with children that go missing 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. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, female genital mutilation and forced marriage. Further information about children at risk of missing education can be found in the [Children Missing Education guidance](#). The School will contact the local authority if a child has had ten days unexplained absence from school, but before that happens, the School Office will ring the child's home every day that he/she is not in school in order to speak to the parent or carer and to seek an explanation for the absence. Where a pattern of absence develops, the Assistant Head Pastoral will liaise with the relevant Housemaster / mistress and request a meeting with the parent to explore the reasons for the absence.

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. This can manifest itself via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting. Staff should be aware of school's [procedure](#) with regard to peer on peer abuse or the [Anti-Bullying Policy](#).

Annex A to KCSIE 2018 contains important additional information about specific forms of abuse and safeguarding issues, including: Children missing from education, child sexual exploitation, child criminal exploitation: county lines, domestic abuse, so-called 'honour-

based' violence (HBV) and peer-on-peer abuse. School leaders and those staff who work directly with children should read the annex.

#### **Signs of Sexual Abuse**

- Sudden changes in behaviour or school performance
- Inappropriate sexualised behaviour
- Tendency to cling, need reassurance
- Tendency to cry easily
- Regression to young behaviour
- Apparent secrecy
- Anorexia or bulimia
- Unexplained pregnancy
- Phobias, panic attacks
- Distrust of a familiar adult

#### **Signs of Emotional Abuse**

- Physical, mental and emotional development lags
- Over-reaction to mistakes
- Compulsive stealing, scavenging
- Running away
- Sudden speech disorders
- Drug solvent abuse
- Self-mutilation
- Extremes of passivity or aggression
- Admission of punishment which appears excessive
- Fear of parents being contacted

#### **Signs of Neglect**

- Constant hunger
- Poor personal hygiene
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Destructive tendencies
- Low self esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

#### **Signs of Physical Abuse**

- Unexplained injuries or burns, particularly recurrent
- Improbable excuses
- Refusal to discuss injuries
- Untreated injuries
- Withdrawal from physical contact
- Arms / legs covered in hot weather
- Aggression towards others
- Fear of medical help
- Fear of returning home
- Running away
- Bald patches
- Self-destructive tendencies

#### **Signs that FGM may have occurred**

- Prolonged absence from school or other activities with noticeable behaviour change on return
- Possible bladder or menstrual problems
- Difficulty in sitting still or looking comfortable

#### **Signs of Child Sexual Exploitation**

- Sudden appearance of unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends/girlfriends
- Suffering from STDs or becoming pregnant

- Complaints about pain between their legs
- Reference to actions carried out upon them by others that they are not allowed to talk about
- Experiencing changes in emotional well-being
- Misuse of drugs/alcohol
- Absence from home for periods of time or regularly returning home late
- Absence from school

## **WHAT TO DO IF A CHILD MAKES A DISCLOSURE ABOUT ABUSE**

Teachers must be watchful, since a pupil may broach the subject in a roundabout way.

Listen carefully, without showing signs of disquiet. Be reassuring. Do not express disbelief and take the allegation seriously.

Confidentiality should not be promised. Explain that you will have to share information to protect the child. If he/she draws back from speaking, inform the child of the possibility of making a private, confidential telephone call to Childline on 0800 1111. Childline's approach is to listen, discuss options and encourage the child to seek help from a trusted adult.

Do not interrogate or enter into detailed investigations; encourage the child to speak freely without any suggestion that judgement is being passed. Listen rather than talk. In depth questioning could compromise a subsequent investigation by trained social workers or police. Where questions are asked they should be 'open ended' rather than 'leading' questions which suggest possible answers. Leading questions may invalidate the child's testimony in court. Allow the child to tell the story, perhaps by asking 'Would you like to tell me about it?' or 'What happened?' Check out your understanding with the child if you are unclear.

Observe carefully the behaviour or demeanour of the child or person expressing concern.

Ensure that the child is not left alone if he/she is distressed or fears going home.

On the same day, as soon after the disclosure as possible, record in detail, what you have seen and heard, preferably quoting words actually used, e.g. parts of the body. In the case of physical injury, draw a sketch to show the size and position of the injury. These confidential notes must be signed, dated and given to the Designated Safeguarding Lead and a copy retained by the member of staff for reference should the case go further.

These procedures also apply when a third party expresses concern about a child.

Allegations against the Prep School Head, Designated Safeguarding Lead, staff/volunteers are made directly to the Head of the whole School who will report this to the LADO.

Allegations against the Head of the whole School, without notifying the Head, are made directly to the Chairman of Governors, who will report this to the LADO. The Chairman of Governors can be contacted on [chairman@bancrofts.org](mailto:chairman@bancrofts.org).

In cases of emergency, a referral can be made directly by the person concerned. Parental consent is not required for referrals to statutory agencies.

### **LOOKED AFTER CHILDREN**

The most common reason for children becoming looked after is as a result of abuse and/or neglect.

The School undertakes that the Designated Safeguarding Lead and other appropriate staff have the skills, knowledge and understanding necessary to keep looked after children safe.

In particular, the School ensures that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with the consent of parents or on an interim or full care order) and the relevant contact arrangements with birth parents or those with parental responsibility. The Designated Senior Lead will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead also has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, the School will work together with all agencies and take prompt action to safeguard these children, who are a particularly vulnerable group. The Designated Safeguarding Leads will work with the local authority Personal Advisor appointed to guide and support the care leaver, and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

### **CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES**

Children with special educational needs and disabilities can provide additional safeguarding challenges. The school's Safeguarding Policy reflects that additional barriers can exist when recognising abuse and neglect in this group of children.

It is possible for children with SEN and disabilities that these needs are seen first and the potential for abuse second. If a child is looking distressed or behaviour patterns and demeanour have changed, staff should think about that being a sign of the potential for abuse, and not simply see it as part of the child's disability or special educational needs. Therefore, assumptions should not be made that the indicators of abuse such as behaviour, mood and injury relate to the child's impairment without further exploration.

Children with SEND and disabilities have a higher risk of being left out, of being isolated from their peers, and they are disproportionately affected by bullying without showing any outward signs. Staff are encouraged to make sure that children with SEN and disabilities have a greater availability of mentoring and support.

When applying disciplinary measures such as restraint or isolation in response to incidents involving children with SEN and disabilities, the School will consider the risks carefully, given the additional vulnerability of the group. To safeguard a pupil or student and others, it may be necessary to use restraint and yet restraint is likely to impact on the well-being of the child. The planning of positive, proactive and individually-tailored behavioural support can reduce the occurrence of risky behaviour and the need to use restraint.

## **FEMALE GENITAL MUTILATION**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003. It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5b of the FGM Act 2003 introduces a mandatory duty which requires regulated health and social care professionals and teachers in England and Wales to report "known" cases of FGM in under 18s which they identify in the course of their professional work to the police. **The duty applies from 31 October 2015 onwards.** A "known" case is one that is visually identified or disclosed to the member of staff by the girl. The member of staff need not be 100 per cent certain that FGM has been carried out before reporting the matter.

The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 (at the time of the disclosure) that an act of FGM has been carried out on her; or
- Observe 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.

The duty to report a disclosure or concern regarding FGM is a personal duty, requiring the member of staff to report the matter directly (see below) and cannot be transferred. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the member of staff must report this to the police. Failure to do so is a criminal offence.

To report suspected cases of FGM, staff are asked to call 101 and report the matter directly to the police force where the girl resides. **In cases where there is a potential for immediate endangerment then it is appropriate to dial 999 and ask for immediate police intervention.**

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made. This will include the circumstances surrounding the initial identification or disclosure of FGM, any details of any safeguarding actions which were taken and when and how the case was reported to the police, including the case reference number. The Designated Safeguarding Lead, (Elizabeth Channer, Senior School or Lisa Life, Prep School) should be kept updated throughout this period.

Reporting should be made as soon as possible after a case is discovered and best practice is for reports to be made by the **close of the next day**. Of course where an immediate report to the police may place that girl or other members of the family in danger then a delay in reporting may be necessary. In such cases then members of staff are asked to speak to the DSL to seek advice and record any decisions made. The DSL may decide to speak to the LADO in such cases. **It is important to remember the safety of the girl is the priority.**

Once reported, the member of staff's duty has been discharged. Depending on your role subsequent information provided by the police may be limited in such cases.

#### **FAILURE TO COMPLY WITH THE FGM DUTY**

The school will need to consider any failure to comply with the duty in accordance with staff disciplinary procedures. Where the school determines it is appropriate to dismiss the teacher as a result of the failure to comply, or the teacher would have been dismissed had they not resigned, the school must consider whether to refer the matter to the National College of Teaching and Leadership (NCTL) in England, as regulators of the teaching profession.

The NCTL will consider referrals to determine whether the facts presented in respect of the individual's failure to comply with the duty are proven and whether they amount to unacceptable professional conduct or conduct likely to bring the profession into disrepute. If proven, the NCTL will consider whether it is appropriate to make a prohibition order which prevents the individual from carrying out teaching work in any school, children's home, sixth form college, and relevant youth accommodation in England.

## **CONTACT DETAILS**

### **Redbridge LADO:**

Redbridge LADO Tel: **020 8708 5350**

If you have a concern about a child and would like to seek advice regarding child abuse or neglect please contact the Child Protection Assessment Team (CPAT).

Referrals can be sent to [cpat.referrals@redbridge.gov.uk](mailto:cpat.referrals@redbridge.gov.uk)

Tel: **020 8708 3885** (9.00am to 5.00pm) or **020 8708 5897** (after 5.00pm)

Lynton House, 255-259 High Road, Ilford, Essex, IG1 1NN

### **Waltham Forest LADO:**

Waltham Forest LADO Tel: **020 8496 3646 / 07791 559 789** or **020 8496 8276 / 07854 238 759**

### **Essex LADO:**

Children's Safeguarding Service **03330 139 797**

[childrens.safeguarding@essex.gov.uk](mailto:childrens.safeguarding@essex.gov.uk)

### **Newham LADO:**

Newham LADO Tel: **020 3373 3803**

## **COUNTER-TERRORISM/PREVENT DUTY**

From 1 July 2015 all schools, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, to have “due regard to the need to prevent people from being drawn into terrorism”, this is known as the “Prevent Strategy”.

In order for schools and childcare providers to fulfil the Prevent Duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools’ and childcare providers’ wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools and childcare providers can also build pupils’ resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent Duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Prevent Duty is entirely consistent with schools’ and childcare providers’ existing responsibilities and should not be burdensome.

The statutory guidance on the Prevent Duty summarises the requirements on schools and childcare providers in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. This advice focuses on those four themes. Concerns pertaining to Prevent Duty must be reported to the Safeguarding Lead in the same way as all other safeguarding issues.

Additional information for identifying other areas of concern and how to respond can be found [here](#).

## **RISK ASSESSMENT**

The statutory guidance makes clear that schools and childcare providers are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

Schools are in an important position to identify risks within a given local context. It is important that schools understand these risks so that they can respond in an appropriate and proportionate way. At the same time schools and childcare providers should be aware of the

increased risk of online radicalisation, as terrorist organisations such as ISIL (aka ISIS) seek to radicalise young people through the use of social media and the internet. The local authority and local police will be able to provide contextual information to help schools and childcare providers understand the risks in their areas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent Duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out in the relevant statutory guidance, [Working together to safeguard children](#) and [Keeping children safe in education](#).

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. [Detailed guidance on Channel is available](#).

An [online general awareness training module on Channel is available](#). The module is suitable for school staff and other front-line workers. It provides an introduction to the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

## **WORKING IN PARTNERSHIP**

The Prevent Duty builds on existing local partnership arrangements. Local authorities are vital to all aspects of Prevent work. In some priority local authority areas, Home Office fund dedicated Prevent co-ordinators to work with communities and organisations, including schools. Other partners, in particular the police and also civil society organisations, may be able to provide advice and support to schools on implementing the duty.

Effective engagement with parents / the family is also important as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms.

## **STAFF TRAINING**

The statutory guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The Home Office has developed a core training product for this purpose – Workshop to Raise Awareness of Prevent (WRAP). There are a number of professionals – particularly in safeguarding roles - working within Local Authorities, the Police, Health and Higher and Further Education who are accredited WRAP trained facilitators.

As a minimum, however, schools should ensure that the Designated Safeguarding Lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

All staff have received training in when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

## **ICT POLICIES**

The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools, this includes potentially harmful and inappropriate online material. The school has in place filtering software to prevent access to terrorist and extremist websites and identify the use of search engines to search any terms which may be associated with such organisations.

As with other online risks of harm, every teacher needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

The School has an [Online Safety Policy \(5.24\)](#) which outlines the School's mobile technology policy.

## **BUILDING CHILDREN'S RESILIENCE TO RADICALISATION**

Bancroft's School can build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. Schools are already expected to promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values. [Advice on promoting fundamental British values in schools is available.](#)

Personal, Social and Health Education (PSHE) is already used to provide pupils with time to explore sensitive or controversial issues, and equipping them with the knowledge and skills to understand and manage difficult situations. PSHE can be used to teach pupils to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help. Schools can encourage pupils

to develop positive character traits through PSHE, such as resilience, determination, self-esteem, and confidence.

PSHE is also used to provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It should equip pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In the PSHE curriculum pupils learn about democracy, government and how laws are made and upheld. Pupils are also taught about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding. A number of resources are available to support staff in this work and are stored in the WCR and on the VLE.

#### **REFERENCE MATERIAL**

<a href="#"><u>What To do If You Are Worried A Child Is Being Abused</u></a>	2015
<a href="#"><u>Redbridge Child Protection Policy and Procedures</u></a>	2015
<a href="#"><u>Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings</u></a>	2009
<a href="#"><u>Working Together to Safeguard Children</u></a>	2018
<a href="#"><u>Keeping Children Safe in Education</u></a>	2018
<a href="#"><u>The Prevent Duty</u></a>	2015
<a href="#"><u>The Prevent Duty departmental advice for Schools and childcare providers</u></a>	2015
<a href="#"><u>The use of Social Media for online radicalisation</u></a>	2015
<a href="#"><u>Mandatory Reporting of FGM – procedural information</u></a>	2015
<a href="#"><u>Educate against Hate</u></a>	
<a href="#"><u>Metropolitan Police – Know the facts</u></a>	
<a href="#"><u>Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018</u></a>	

## **APPENDIX A**

### **STAFF CODE OF CONDUCT**

#### **Relationships with pupils: ways in which Members of Staff can protect themselves from allegations of abuse or professional misconduct**

***Friendly, caring relationships between staff and pupils are encouraged but professional boundaries must be maintained.***

- Physical contact with pupils - be wary about providing physical comfort or any demonstration of affection in the light of complaints that might be made.
- Where exercises or procedures need to be demonstrated, extreme caution should be used if this involves physical contact with the pupils. Whenever possible, such contact should be avoided.
- Force used to avert an immediate danger - if action needs to be taken to protect a child (e.g. in the case of fighting) and physical intervention proves necessary, it should be the minimum force required to prevent injury. Unless the situation is so urgent as to require immediate intervention, non-physical de-escalation techniques should be used initially. If physical force is used to restrain a child who is a danger to him or herself or is endangering others, the incident should be reported to senior staff as soon as possible after the incident.
- Corporal punishment - there must be no use of corporal punishment or any form of physical aggression towards pupils.
- Adults and one-to-one situations - where adults operate in a one-to-one situation they must always act in the appropriate professional manner and be mindful of the potential for false accusations of misconduct. It is advisable to use a room with a window in the door or leave the door ajar when meeting with a child. We continue to investigate means with which we can install cost effective CCTV technology in minibuses to protect staff and pupils when driving pupils on their own.
- Adults must take care if there is a need to enter pupils' toilets or changing rooms. Adults must use Staff toilets.
- On residential trips, take care when entering sleeping areas and avoid liaison with pupils of the opposite gender. Take care with choice of appropriate nightwear.
- Avoid giving lifts to pupils other than in school vehicles. If special circumstances make it necessary to use a privately owned car notify the school office. Out of normal school office hours (07.45-19.00) contact the Senior Deputy Head of the Senior School on her mobile phone.
- Staff should not normally socialise with pupils other than at events arranged by the school and should be particularly careful in locations where alcohol is available.

- Staff are advised not to communicate with pupils on social networking sites. Care must be taken with all forms of communication with pupils including electronic communication. All efforts should be made to ensure that communication with pupils is carried out using the school email accounts provided to the member of staff and pupils. It is recognised that occasionally there is a need to divulge mobile phone numbers, for example on school trips. In such instances it is best to use one of the school mobile phones for this purpose.
- Details of home address, personal email address, phone numbers should not normally be given to pupils or their parents. Do not divulge personal contact details of a colleague without consent.
- Exercise extreme care with images of children. If taking photos of pupils for school/departmental publicity using a camera or mobile phone avoid putting photographs or video images on your own personal computer or keeping them on your mobile phone. Use your school computer and network space to store such images. School cameras should be used where possible. The school has a stock of cameras held by the Reprographics Manager.
- Endeavour to prevent gossip spreading about pupils, parents, colleagues or other members of the school community.
- Take care to protect your own reputation and that of the school, for example by not using inappropriate language or exceeding appropriate conversational boundaries, especially with pupils.
- If a Member of staff feels threatened or compromised by the actions of a pupil or other member of the school community, a member of Senior Leadership Team should be approached for support.
- It is recognised that these guidelines do not cover every situation. Members of staff must always use their professional judgement and discretion.
- Staff have a mandatory duty to report FGM to the police / external agencies.
- Staff will adhere to confidentiality under the Data Protection Act, at all times except when information has to be passed onto a third party who is required to be notified under the school's safeguarding and child protection procedures.

Staff are reminded that it is an offence for a person aged 18 or over, such as a 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 i.e. they attend Bancroft's School, even if, in the case of those over 16, the relationship is consensual, regardless of whether or not they teach them.