



SAFEGUARDING (CHILD PROTECTION) POLICY

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SAFEGUARDING (CHILD PROTECTION) POLICY

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 the pupils 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 and 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 ethos of safeguarding and listening 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 Deputy Head Pastoral, Elizabeth Channer (Tel: 020 8505 4821 x8130; direct line 0208 506 6767; elizabeth.channer@bancrofts.org), to be the Designated Safeguarding Lead (a detailed job description for the Deputy Head Pastoral, including her role as DSL can be found [in the Staff Handbook](#)) in the Senior School and the Deputy Head Pastoral, Lisa Life (Tel 020 8506 6751, 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 and their reports are minuted. Antonia Fryer-Green (Tel 020 8505 4821 x8111 antonia.fryer-green@bancrofts.org, and James Barr, Assistant Head Pastoral james.barr@bancrofts.org are the Deputy Designated Safeguarding Leads in the Senior School. 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), and Beta Year Group Leader, Laura Dalton (020 8506 6751 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.

WHILSTLEBLOWING 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 what you can do to report abuse dedicated 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 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 that procedures comply with current legislation and the 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' (2019).

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:

'Bancroft's is committed to safeguarding and promoting the welfare of children'
 - 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 visitor's 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 visitor's 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) are asked to read and confirm in writing (either electronically or otherwise) that they have read and understood Part 1 and Annex A of KCSIE 2019, the School Safeguarding Policy which includes the Staff Code of Conduct (Appendix A). A record of this is kept by HR and Deputy Head Pastoral. The acceptable use of ICT, staff/pupil relationships and communications (including use of social media) form 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.

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 Safeguarding Policy, the Staff Code of Conduct and the identity of both the Designated Safeguarding Lead and the Deputies. A copy of Part 1 and Annex A of KCSIE 2019 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 Staff Code of Conduct (referred to sometimes as the Staff Behaviour Policy) and information regarding the role of the Designated Safeguarding Lead.

Through the Learning For Life (Formerly known as 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 in reception when they depart and sign in when they return. The School's Registration Procedures outline what to do in the case of a missing pupil (Missing Pupil Policy).

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, neglect or involvement in criminal activity. 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 Year Group 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 of all teachers are displayed 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 Learning for Life programme, including internet safety.

Pupils are given opportunities in Learning for Life, 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 Multi Agency Safeguarding Hub (MASH Team). Every effort is made to set expectations of acceptable behaviour and to encourage open, healthy 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 School Congress 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 stand-alone events that can be covered by one 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, including upskirting 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 the appropriate 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 Children's Services, the LADO or the police and not with the School. The Designated Safeguarding Lead maintains contact with Children's Services or the LADO and their team and will make a referral within 24 hours. The DSL will consult Children's Services or the LADO 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 or Children's Services directly.

When concerns about a pupil are raised but the decision is made not to make a referral to the LADO or Children's Services, 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. 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

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

WalthamForestLADO:

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

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@db.sgsi.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, upskirting 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 be 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 as part of multi-agency safeguarding arrangements. 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, find it difficult to develop a sense of self-worth. They may blame themselves, display challenging behaviour or 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.

Also see reference to 'Upskirting' on page 20 of this document.

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.

Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, is now a criminal offence.

Children Missing from Education: A child going missing from education is a potential indicator of abuse, neglect or involvement with criminal activity 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 Deputy 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, truancy 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 (2019) includes 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 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 that FGM may have occurred

- Prolonged absence from school or other activities with noticeable behaviour change on return

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 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 of Child Sexual Exploitation

- Sudden appearance of unexplained gifts or new possessions
- Associating with other young people involved in exploitation

- Possible bladder or menstrual problems
- Difficulty in sitting still or looking comfortable
- Complaints about pain between their legs
- Reference to actions carried out upon them by others that they are not allowed to talk about
- Having older boyfriends/girlfriends
- Suffering from STDs or becoming pregnant
- 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 crucially, 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.

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 and depending on his or her role, subsequent information provided by the police may be limited.

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

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

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 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.](#)

Learning for Life, (known as 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. Learning for Life 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 Learning for Life, such as resilience, determination, self-esteem, and confidence.

Learning for Life 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 Learning for Life 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

<u>What To do If You Are Worried A Child Is Being Abused</u>	2015
<u>Redbridge Child Protection Policy and Procedures</u>	2015
<u>Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings</u>	2009
<u>Working Together to Safeguard Children</u>	2018
<u>Keeping Children Safe in Education</u>	2019
<u>The Prevent Duty</u>	2015
<u>The Prevent Duty departmental advice for Schools and childcare providers</u>	2015
<u>The use of Social Media for online radicalisation</u>	2015
<u>Mandatory Reporting of FGM – procedural information</u>	2015
<u>Educate against Hate</u>	
<u>Metropolitan Police – Know the facts</u>	
<u>Sexual Violence and Sexual Harassment between Children in Schools and Colleges 2018</u>	

APPENDIX A

STAFF CODE OF CONDUCT

Purpose and application

- 1 **Purpose:** Relationships with fellow Staff, employees, governors, contractors, visitors, volunteers, pupils and their parents, guardians or carers should be reasonable and mutually respectful at all times. This Code has been produced to place the welfare of children at the centre of the School and its culture and to ensure that all those who work in the School and may have contact with children are clear on the rules of conduct and the expectations of the School. Children place trust in those connected to the School creating obligations which we must all meet to ensure the successful outcomes achieved by the children in our care.
- 2 This Code has regard to the School's child protection and safeguarding policy and procedures and the following (collectively referred to in this Code as the **Guidance**):
 - 2.1 *Keeping children safe in education* (September 2019) (**KCSIE**) (which refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015));
 - 2.2 *Disqualification under the Childcare Act 2006* (July 2018);
 - 2.3 *Working together to safeguard children* (July 2018) (**WT**):
 - 2.3.1 WT refers to the non-statutory advice: *Information sharing* (July 2018).
 - 2.4 *Prevent Duty Guidance: for England and Wales* (2015) (**Prevent**). Prevent is supplemented by:
 - 2.4.1 *The Prevent duty: Departmental advice for schools and childminders* (June 2015);
 - 2.4.2 *Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism* (2015)
 - 2.4.3 *The use of social media for online radicalisation* (July 2015).
 - 2.5 Guidance on female genital mutilation, to include:
 - 2.5.1 *Multi-agency statutory guidance on female genital mutilation* (October 2018)
 - 2.5.2 Home Office statutory guidance *Mandatory Reporting of Female Genital Mutilation: procedural information* (October 2015).
 - 2.5.3 Guidance published by the Department for Health which provides useful information and support for health professionals which will be taken into account by the School's medical staff.
- 3 The purpose of the Code is to:

- 3.1 confirm and reinforce the professional responsibilities of all Staff;
 - 3.2 clarify the legal position in relation to sensitive aspects of Staff / pupil relationships and communication including the use of social media;
 - 3.3 set out the expectations of standards and behaviour to be maintained within the School; and
 - 3.4 to help adults establish safe practices and reduce the risk of false accusations or improper conduct.
- 4 **Application:** The Code of Conduct (**Code**) applies to all Staff working in the School (**School**), whether paid or unpaid, whatever their position, role or responsibilities and **Staff** includes employees, governors, contractors, work experience / placement students and volunteers.
- 5 **Your duty:** It is the contractual duty of every member of Staff to observe the rules and obligations in this Code. You should also follow the Guidance. The School also has a duty of care to its Staff, parents, guardians or carers and pupils and the implementation of the practices in this Code will help to discharge that duty.
- 6 **Wrongdoing:** All staff are required to report their own wrongdoing, or any wrongdoing or proposed wrongdoing of any other member of staff or any conduct which they may suspect to be inappropriate to their line manager. The School operates a whistleblowing policy which is contained within this Employment Manual.
- 7 **Application with other policies:** The Code should be read in conjunction with the School's child protection and safeguarding policy and procedures and whistleblowing policy.

Guiding principles

8 Principles for all Staff

- 8.1 All Staff should put the well-being, development and progress of all pupils first by:
 - 8.1.1 taking all reasonable steps to ensure the safety and well-being of pupils under their supervision;
 - 8.1.2 using professional expertise and judgment for the best interests of pupils in their care;
 - 8.1.3 demonstrating self-awareness and taking responsibility for their own actions and for providing help and support to pupils;
 - 8.1.4 raising concerns about the practices of teachers or other professionals where these may have a negative impact on pupils' learning or progress, or may put pupils at risk;
 - 8.1.5 being familiar with the School's child protection and safeguarding policy and procedures;
 - 8.1.6 reading and understanding Part 1, and where appropriate Annex A, of KCSIE (September 2019);

- 8.1.7 knowing the role, identity and contact details of the current Designated Safeguarding Lead and their Deputies;
 - 8.1.8 knowing the role, identity and contact details of the Nominated Safeguarding Governor; and
 - 8.1.9 being aware that they are in a position of trust (i.e. the adult is in a position of power or influence over the pupil due to his or her work); that the relationship is not a relationship between equals and that this position must never be used to intimidate, bully, humiliate, coerce or threaten pupils.
- 8.2 All Staff should demonstrate respect for diversity and take steps to promote equality by:
- 8.2.1 acting appropriately and in accordance with this Code of Conduct, towards all pupils, parents, guardians or carers and Staff;
 - 8.2.2 complying with the School's anti-bullying, Equal Opportunities and Dignity at Work policies and this Code of Conduct;
 - 8.2.3 addressing issues of discrimination and bullying whenever they arise; and
 - 8.2.4 helping to create a fair and inclusive School environment.
- 8.3 All Staff should work as part of a unified Staff body by:
- 8.3.1 developing productive and supportive relationships with colleagues;
 - 8.3.2 exercising any management responsibilities in a respectful, inclusive and fair manner;
 - 8.3.3 complying with all School policies and procedures;
 - 8.3.4 participating in the School's development and improvement activities;
 - 8.3.5 recognising the role of the School in the life of the local community; and
 - 8.3.6 upholding the School's reputation and standing within the local community and building trust and confidence in it.
- 8.4 All Staff should understand that the School has a legal duty to have regard to the need to prevent people from being drawn into terrorism, and consequently should be aware of:
- 8.4.1 what extremism and radicalisation means and why people - including pupils and fellow staff members - may be vulnerable to being drawn into terrorism as a consequence of it;
 - 8.4.2 what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it; and

- 8.4.3 how to obtain support for people who may be being exploited by radicalising influences.
- 8.5 All Staff should maintain public trust and confidence in the School and in their profession by:
 - 8.5.1 demonstrating honesty and integrity;
 - 8.5.2 understanding and upholding their duty to safeguard the welfare of children and young people;
 - 8.5.3 understanding and demonstrating fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs;
 - 8.5.4 maintaining reasonable standards of behaviour whether inside or outside of normal School hours and whether on duty or off the School's site; and
 - 8.5.5 maintaining an effective learning environment.
- 8.6 All Staff should raise any concerns relating to female genital mutilation (FGM) with the Designated Safeguarding Lead and involve children's social care as appropriate in accordance with the School's child protection and safeguarding policy and procedures. Teachers must also report to the police cases where they discover (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18. The report should be made orally by calling 101, the single non-emergency number. It will be rare for teachers to see visual evidence, and they should not be examining pupils but those failing to report such cases will face disciplinary sanctions.

9 Additional principles for teachers

- 9.1 Teachers should take responsibility for maintaining the quality of their teaching practice by:
 - 9.1.1 meeting the professional standards for teaching applicable to their role and position within the School;
 - 9.1.2 reflecting on their current practice and seeking out opportunities to develop knowledge, understanding and skills;
 - 9.1.3 helping pupils to become confident and successful learners; and
 - 9.1.4 establishing productive relationships with parents, guardians or carers by:
 - (a) providing accessible and accurate information about their child's progress;
 - (b) involving them in important decisions about their child's education; and
 - (c) complying with this Code.

Guidance on Staff / pupil relationships

- 10 **Application:** Allegations of unprofessional conduct or improper contact or words can arise at any time. Professionalism and vigilance are required so as to ensure the safety of children in our care, and to reduce the risk of an allegation of impropriety against a member of Staff. This guidance applies to all Staff.
- 11 **Sexual contact:** Staff must not:
- 11.1 have any type of sexual relationship with a pupil or pupils;
 - 11.2 have sexually suggestive or provocative communications with a pupil;
 - 11.3 make sexual remarks to or about a pupil; and
 - 11.4 discuss their own sexual relationships in the presence of pupils.
- 12 **Abuse of a position of trust and inappropriate relationships with School pupils:** Sexual relationships or sexual contact with any pupils, or encouraging a relationship to develop in a way which might lead to a sexual relationship or any relationship just considered inappropriate with any pupil at the School is a grave breach of trust that will usually lead to disciplinary action and may also lead to criminal prosecution. It is the criminal offence of an abuse of a position of trust to have any sexual relationship with any School pupil under the age of 18, and whilst not a criminal offence, it is a breach of this Code and considered to be gross misconduct to have a sexual relationship with any pupil of this School, even if over the age of 18.
- 13 **Inappropriate relationships with pupils at another school:** Forming relationships with children or young people who are pupils or students at another school will be a criminal offence if they are under 16 but may also be a criminal offence if under the age of 18 and will be regarded as gross misconduct. Such behaviour tends to bring the School into disrepute and gives rise to concern that the Staff involved cannot be trusted to maintain professional boundaries with pupils and students at the School. Whilst not necessarily a criminal offence, the School considers it inappropriate for Staff to form inappropriate relationships with a pupil of any school, irrespective of their age.
- 14 **General guidance:** You should be aware of the general guidance that will apply in all cases. In particular you:
- 14.1 need to exercise professional judgment but always act within the spirit of these guidelines. If you are involved in a situation where no specific guidance exists, you should discuss the circumstances with the Designated Safeguarding Lead. A written record should be kept that includes justification for any action taken;
 - 14.2 must be aware of the risks of peer-on-peer abuse and be familiar with procedures for handling allegations against other children and bullying as set out in the School's child protection and safeguarding policy and procedures. Examples of peer-on-peer abuse are bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, sexting and initiation and hazing;

- 14.3 must be familiar with procedures for reporting concerns in accordance with the School's whistleblowing policy and be aware that if Staff raise concerns about working practices at the School to the Designated Safeguarding Lead or an appropriate senior member of Staff that they will be protected from detriment under the whistleblowing policy;
 - 14.4 must be familiar with the local reporting guidelines and the Local Safeguarding Children Board¹ reporting threshold document in respect of any concerns relating to children;
 - 14.5 must be familiar with procedures for handling allegations against Staff as set out in the School's child protection and safeguarding policy and procedures;
 - 14.6 must seek guidance from the Designated Safeguarding Lead if you are in any doubt about appropriate conduct; and
 - 14.7 must report any actions which could be misinterpreted, any misunderstandings, accidents or threats involving you and a pupil or a group of pupils to the Designated Safeguarding Lead.
- 15 **Behaviour giving particular cause for concern:** You should take particular care when dealing with a pupil who:
- 15.1 appears to be emotionally distressed, or generally vulnerable and / or who is seeking expressions of affection;
 - 15.2 appears to hold a grudge against you;
 - 15.3 acts in a sexually provocative way, or who is inclined to make exaggerated claims about themselves and others, or to fantasise, or one whose manner with adults is over-familiar; and
 - 15.4 may have reason to make up an allegation to cover the fact that he or she has not worked hard enough for public examinations.
- 16 **Procedure to be followed in these cases:** Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Safeguarding Lead under the School's child protection and safeguarding policy and procedures.
- 17 **Record keeping:** Comprehensive records are essential. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing . Any incident involving children that could give cause for concern, must always be reported promptly to the Designated Safeguarding Lead in accordance with the School's child

¹ Drafting note: Local authority areas are required to complete their transition from Local Safeguarding Children Boards to Safeguarding Partner arrangements by 29 September 2019. It is expected that independent schools will be named by local Safeguarding Partners as 'relevant agencies' and will have a duty to cooperate with the arrangements for their area. In the meantime, Local Safeguarding Children Boards must continue to carry out all of their statutory functions until the point at which Safeguarding Partner arrangements begin to operate. References to the Local Safeguarding Children Board in this document will need to be updated in due course to reflect the local arrangements.

protection and safeguarding policy and procedures. If there is any doubt about recording requirements this should be discussed with the Designated Safeguarding Lead.

- 18 **Good order and discipline:** Staff in charge or control of pupils must maintain good order and discipline at all times when pupils are present on School premises and whenever pupils are engaged in authorised School activities, whether on School premises or elsewhere.

General conduct

- 19 **School property:** You must take proper care when using School property and you must not use School property for any unauthorised use or for private gain.
- 20 **Use of premises:** You must not carry out any work or activity on School premises other than pursuant to your terms and conditions of employment without the prior permission of the Head.
- 21 **Behaviour of others:** You should be aware that the behaviour of your partner or other family members or any member of your household may raise concerns which could affect the welfare of a member of the School community, a member of the public, or bring the School into disrepute and you should bring any such behaviour to the immediate attention of the School. Such concerns will be given careful consideration as to whether they constitute a potential risk to children at the School or its reputation.

Meetings with pupils

- 22 **One-to-one meetings:** If you are teaching one pupil, or conducting a one-to-one meeting or teaching session with a pupil, you should take particular care in the following ways:
- 22.1 when working alone with a pupil is an integral part of your role, conduct and agree full risk assessments with the Designated Safeguarding Lead;
 - 22.2 use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson / meeting is taking place;
 - 22.3 arrange the meeting during normal school hours when there are plenty of other people about;
 - 22.4 do not continue the meeting for any longer than is necessary to achieve its purpose;
 - 22.5 avoid sitting or standing in close proximity to the pupil, except as necessary to check work;
 - 22.6 avoid using "engaged" or equivalent signs on doors or windows;
 - 22.7 avoid idle discussion;
 - 22.8 avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;
 - 22.9 avoid any conduct that could be taken as a sexual advance;

- 22.10 report any incident that causes you concern to the Designated Safeguarding Lead under the School's child protection and safeguarding policy and procedures, and make a written record (signed and dated); and
 - 22.11 report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.
- 23 **Pre-arranged meetings:** Pre-arranged meetings with pupils outside School should not be permitted unless approval is obtained from their parents, guardians or carers and the Designated Safeguarding Lead. If you are holding such a meeting, you should inform colleagues before the meeting.
- 24 **Home visits:** In some circumstances home visits are necessary. You should:
- 24.1 discuss the purpose of any visit with the Designated Safeguarding Lead and adhere to any agreed work plan / contract;
 - 24.2 follow the risk management strategy and ensure appropriate risk assessments are in place. Where there is insufficient information to complete a risk assessment, ensure that you are accompanied by a colleague;
 - 24.3 not visit unannounced if this can be avoided;
 - 24.4 leave the door open where you will be alone with pupils;
 - 24.5 keep records detailing times of arrival and departure, and work undertaken;
 - 24.6 ensure that any behaviour or situation that gives rise to a concern is reported and actioned;
 - 24.7 discuss with the Designated Safeguarding Lead anything that gives cause for concern in accordance with the School's child protection and safeguarding policy and procedures; and
 - 24.8 have a mobile telephone and an emergency contact.
- 25 **The use of personal living space:** Pupils should not be in or invited into the personal living space of any member of Staff, unless agreed with the parents, guardians or carers and the Head / Designated Safeguarding Lead. It is accepted that children of Staff (whether in School accommodation or not) may at times invite their friends to their homes. In these instances, Staff are reminded to comply with this Code of Conduct, must ensure that the Head / Designated Safeguarding Lead is informed in advance and that any overnight visit is subject to a written risk assessment.
- 26 **Chores:** Pupils should not be asked to assist with chores or tasks in the personal living space. Personal living spaces should not be used as an additional resource for the School.

Language and appearance

- 27 **Language:** You should use appropriate language at all times. You should:

- 27.1 avoid words or expressions that have any unnecessary sexual content or innuendo; avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc);
 - 27.2 avoid any form of aggressive or threatening words;
 - 27.3 avoid any words or actions that are over-familiar;
 - 27.4 not swear, blaspheme or use any sort of offensive language in front of pupils;
 - 27.5 avoid the use of sarcasm, discriminatory or derogatory words when punishing or disciplining pupils and avoid making unprofessional personal comments about anyone. Any sanctions should be in accordance with the School's behaviour and discipline policies; and
 - 27.6 be aware that some parts of the curriculum may raise sexually explicit subject matters. Care should be taken in subjects where rules / boundaries are relaxed (e.g. drama or art). Staff should have clear lesson plans and should take care to avoid overstepping personal and professional boundaries.
- 28 **Dress:** You should dress appropriately and in a professional manner. Dress must not be offensive, distracting, revealing, or sexually provocative, embarrassing or discriminatory. Political or other contentious slogans or badges are not allowed.

The use of force or physical restraint

- 29 **Physical restraint:** All forms of corporal punishment are unlawful and the use of unwarranted physical force is likely to constitute a criminal offence. The use of physical intervention should be avoided if possible. There are circumstances when it is appropriate for Staff to use force to safeguard children. This is enshrined in law and applies to any member of Staff at the School. It can also apply to people whom the Head has temporarily put in charge of pupils such as unpaid volunteers or parents accompanying students on a school organised visit.
- 30 **Application of code of restraint:** It only applies where no other form of control is available and where it is necessary to intervene. The use of force or physical contact may be reasonable and proportionate in the circumstances to prevent a pupil from doing, or continuing to do any of the following:
- 30.1 committing a criminal offence;
 - 30.2 injuring themselves or others;
 - 30.3 causing damage to property, including their own; or
 - 30.4 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.
- 31 **Before intervening:** Before intervening physically you should, wherever practicable, tell the pupil to stop and what will happen if he or she does not. You 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. You should always avoid

touching or holding a pupil in a way that might be considered indecent. You should also avoid any form of aggressive contact such as holding, pushing, pulling or hitting which could amount to a criminal assault, nor act in a way that might reasonably be expected to cause injury.

- 32 **Inform senior staff:** You should inform the Deputy Head / Head immediately following an incident 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. You should provide a written report as soon as possible afterwards. This should include written and signed accounts of those involved, including the pupil. The parents, guardians or carers of the pupil should be informed about serious incidents involving the use of force. The Deputy Head / Head will advise as to when parents should be contacted.
- 33 **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.
- 34 **Using reasonable force:** There is no legal definition of "reasonable force". It will always depend on the circumstances. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Note that:
- 34.1 any use of force should be proportionate to the behaviour of the pupil involved and the seriousness of the harm prevented;
 - 34.2 you should recognise the additional vulnerability of children with SEN, disabilities and certain medical conditions before using reasonable force;
 - 34.3 physical force could not be justified to prevent a pupil from committing a trivial misdemeanour;
 - 34.4 any force should always be the minimum needed to achieve the desired result; and
 - 34.5 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.

Physical contact in other circumstances

- 35 **When physical contact may be appropriate:** Physical contact with a pupil may be necessary and beneficial in order to demonstrate a required action, or a correct technique in, for example, singing and other music lessons or during PE, sports and games. Any physical contact should be in response to the pupil's needs, of limited duration and appropriate to the pupil's age, stage of development, gender, ethnicity and background. Physical contact

can be easily misinterpreted and should be limited. Staff should use professional judgement.

- 36 **Guidance on using physical contact:** You should observe the following guidelines (where applicable):
- 36.1 explain the intended action to the pupil;
 - 36.2 do not proceed with the action if the pupil appears to be apprehensive or reluctant, or if you have other concerns about the pupil's likely reaction;
 - 36.3 ensure the physical contact continues for as short a time as possible;
 - 36.4 ensure that the door is open and if you are in any doubt, ask a colleague or another pupil to be present during the demonstration; and
 - 36.5 consider alternatives if it appears likely that the pupil might misinterpret the contact.
- 37 **Report concerns:** If you are at all concerned about any instance of physical contact, inform the Deputy Head / Head without delay, and make a written record in the incident book and on the pupil's file if necessary.
- 38 **Offering comfort to distressed pupils:** Touching may be appropriate where a pupil is in distress and needs comforting. You should use your own professional judgement when you feel a pupil needs this kind of support and should be aware of any special circumstances relating to the pupil. For example, a child who has been abused may find physical contact particularly difficult. You should always notify the Deputy Head / Head when comfort has been offered, record the action and should seek guidance if unsure whether it would be appropriate in a particular case.
- 39 **Administering first aid:** When administering first aid you should explain to the child what is happening and ensure that another adult is present or is aware of the action being taken. The treatment must meet the School's health and safety at work rules and intimate care guidelines, and parents, guardians or carers should be informed. Staff should:
- 39.1 adhere to the School's policies on first aid and administering medication;
 - 39.2 comply with the necessary reporting requirements;
 - 39.3 make other adults aware of the task that is being undertaken;
 - 39.4 explain what is happening;
 - 39.5 report and record the administration of first aid;
 - 39.6 have regard to any health plans; and
 - 39.7 ensure that an appropriate health / risk assessment is undertaken prior to undertaking certain activities.

- 40 **Pupils' entitlement to privacy:** Children are entitled to privacy when changing or showering. However there still must be an appropriate level of supervision to ensure safety. You should:
- 40.1 avoid physical contact or visually intrusive behaviour when children are undressed;
 - 40.2 announce yourself when entering changing rooms and avoid remaining unless required;
 - 40.3 not shower or change in the same place as children; and
 - 40.4 not assist with any personal care task which a pupil can undertake themselves.
- 41 **Where a child has been abused:** Where a child has previously been abused, Staff should be informed on a 'need to know' basis, and should be extra cautious when considering the necessity of physical contact. Some children may seek inappropriate physical contact. Staff should sensitively deter the pupil and help them understand the importance of personal boundaries. Such incidents should be reported and discussed with the Designated Safeguarding Lead and where appropriate parents, guardians or carers.
- 42 **Children with special educational needs or disabilities:** Some children may need more physical contact to assist their everyday learning, which should be agreed and understood by all concerned, justified, openly applied and open to scrutiny. The Designated Safeguarding Lead and SENCO will establish whether any reasonable adjustments are required for such pupils.

Code of conduct for contact outside school

- 43 **Contact outside school:** You should avoid unnecessary contact with pupils outside school. You should:
- 43.1 not give pupils your home address, home telephone number, mobile telephone number or email address;
 - 43.2 not send personal communications (such as birthday cards or faith cards, text messages etc) to children unless agreed with the Deputy Head / Head;
 - 43.3 not make arrangements to meet pupils, individually or in groups, outside school other than on school trips authorised by the Deputy Head / Head;
 - 43.4 avoid contacting pupils at home unless this is strictly necessary, and you should keep a record of any such occasion;
 - 43.5 not give a pupil a lift in your own vehicle other than on School business and with permission from the Deputy Head / Head;
 - 43.6 avoid inviting pupils (groups or individuals) to your home unless there is a good reason and it has been approved by Deputy Head / Head;
 - 43.7 report and record any situation which may place a child at risk or which may compromise the School's or your professional standing;

- 43.8 ensure that pupils do not see anything in your home that may cause embarrassment or that might become the subject of inappropriate gossip or rumour; and
 - 43.9 never engage in secretive social contact with pupils or their parents, guardians or carers.
- 44 **Social contact:** You should be aware that where you meet children or parents, guardians or carers socially, such contact could be misinterpreted as inappropriate, an abuse of a position of trust or as grooming. Any social contact that could give rise to concern should be reported to the Deputy Head / Head.
- 45 **Friendships with parents, guardians or carers and pupils:** Members of Staff who are friends with parents, guardians or carers 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. However, members of Staff should still respect the above advice wherever possible and should keep the Deputy Head / Head informed of such relationships.
- 46 **Scope of application of code on contact outside school:** The same guidelines should be applied to after school clubs, school trips, and especially trips that involve an overnight stay away from the School. There are separate, more detailed guidelines for school trips in the educational visits policy. The principles of this guidance also apply to contact with children or young people who are pupils at another school.
- 47 **Transporting pupils:** There may be some situations when Staff are required to transport pupils. You should:
- 47.1 ensure that you are fit to drive and free from any substances that may impair your judgement or ability to drive;
 - 47.2 be aware that until the pupil is passed over to a parent / carer, you have responsibility for that pupil's health and safety;
 - 47.3 record the details of the journey;
 - 47.4 record, be able to justify impromptu or emergency lifts and notify the Deputy Head / Head;
 - 47.5 ensure that there are proper arrangements in place to ensure vehicle, passenger and driver safety, including appropriate insurance, seat belts, adherence to maximum capacity guidelines etc; and
 - 47.6 wherever practicable, you should avoid using private vehicles and should try and have one adult additional to the driver to act as an escort.
- 48 **Educational visits:** When taking part in educational visits, you should:
- 48.1 follow the School's educational visits policy;
 - 48.2 be accompanied by another adult unless otherwise agreed with the Deputy Head / Head;
 - 48.3 undertake a risk assessment; and

48.4 obtain parental consent.

49 **Overnight supervision:** Where overnight supervision is required to preserve the integrity of the examination process:

49.1 you should ensure that a risk assessment has been undertaken and that all members of the household have had the appropriate checks;

49.2 arrangements should be made with and agreed by parents, guardians or carers and the pupil;

49.3 one to one supervision should be avoided where possible;

49.4 choice, flexibility and contact with "the outside world" should be incorporated, so far as it is consistent with appropriate supervision and the School's guidelines;

49.5 whenever possible, independent oversight of the arrangements should be made; and

49.6 any misinterpretation, misunderstanding or complaint should be reported.

Communication with pupils (including the use of technology)

50 **Communicating with children and parents, guardians or carers:** All communication with children or parents, guardians or carers should conform to School policy and be limited to professional matters. Except in an emergency communication should only be made using School property.

51 **Application:** These rules apply to any form of communication including new technologies (including 3G / 4G technologies) such as mobile telephones, web-cameras, social networking websites and blogs. You should also ensure you comply with the more detailed IT acceptable use policy, and social media policy.

52 **Dealing with "crushes":** Crushes, fixations or infatuations are part of normal adolescent development. However they need sensitive handling to avoid allegations of exploitation. Such crushes carry a high risk of words, actions and expressions being misinterpreted, therefore, the highest levels of professionalism are required. If you suspect that a pupil has a crush on you or on another colleague you should bring it to the attention of the Designated Safeguarding Lead at the earliest opportunity. Suggestions that a pupil may have developed a crush should be recorded. Staff should avoid being alone with pupils who have developed a crush on them and if the pupil sends personal communications to the member of Staff, this should be reported to the Deputy Head and recorded.

53 **Acceptable use:** Adults must establish safe and responsible online behaviours and must comply with the IT acceptable use policy, social media policy, the online safety policy and the mobile telephone protocol. Adults should report to senior colleagues, any new and emerging technologies which may have a bearing on School practices and on the review of the IT acceptable use policy. Local and national guidelines on acceptable user policies should be followed. Staff should also:

53.1 ensure that your own personal social networking sites are set as private and ensure that pupils are not approved contacts;

- 53.2 ensure that you do not use any website or application, whether on a School or personal device, which publicly identifies your location while on School premises or otherwise in the course of your employment;
 - 53.3 never use or access social networking sites of pupils and do not use internet or web-based communication channels to send personal messages to pupils;
 - 53.4 never use your own equipment (e.g. mobile telephones) to communicate with pupils - use equipment provided by the School and ensure that parents, guardians or carers have given permission;
 - 53.5 only make contact with pupils for professional reasons; and
 - 53.6 recognise that text messaging should only be used as part of an agreed protocol and only when other forms of communication are not possible.
- 54 **Personal details:** Adults should not give their personal contact details to pupils, including email addresses, home or mobile telephone numbers, unless the need to do so is agreed with the Head and parents, guardians or carers.
- 55 **Personal mobile telephones and electronic devices:** It is understood that staff may need to check text messages and / or personal emails in the case of an emergency or during break times. Personal use must not interfere with your work commitments (or those of others). It is a privilege and not a right. Staff shall set an example and shall never use their own mobile telephones or other electronic devices whilst they are on duty (whether in a classroom or otherwise) and any such mobile devices should be switched off except in the case of an emergency and be kept out of sight of parents or pupils.
- 56 **Communicating outside the agreed protocols:** Email or text communications between an adult and any pupil outside agreed protocols may lead to a report to external agencies in accordance with the School's child protection and safeguarding policy and procedures, disciplinary action and / or criminal investigations. This also includes communications through internet based websites.

Code of conduct for photographs and videos

- 57 **Process:** At school events and activities photographs or video camera footage may be taken for the purposes of promoting or recording School events, preferably on a school phone, but in need on your own, as long as they are immediately downloaded from whatever device has been used on your return to school and deleted from the device on which they were taken. When photos are "published" pupils must not be named.
- 58 **Consent:** Subject to paragraph 62 below, appropriate consents for taking and displaying photographs should be obtained from parents, guardians, carers or from the pupils themselves if sufficiently mature (most pupils are seen as being sufficiently mature from the age of 12 years). Consent must be freely given so it must be a genuine choice. The consent obtained must be specific for the purpose that the photographs will be used for - for instance if the photographs will be used in a school promotion, specific consent should be obtained for this use, and the photographs should not then be used for any other use without new consent being requested and obtained. There are additional rules around seeking consent. Please see the guidance for staff on the use of photographs and videos of

pupils by the school for further information. Any consent will need to be sought from either the parent, the pupil or both depending on the maturity of the pupil.

- 59 Where the use of a photograph or video is less privacy intrusive (e.g. used in an internal school display) it is sufficient for parents and pupils to have been informed about this in the School's privacy notices, in which case consent is not required. Please speak to the Bursar if you require guidance on whether consent should be obtained.
- 60 Some pupils cannot be featured in photographs or videos under any circumstances (for example, because of safeguarding concerns). Please speak to the Designated Safeguarding Lead if you are unsure to which pupils this applies.
- 61 **Guidance:** Where consent (if appropriate) has been obtained, the following should be considered:
- 61.1 the purpose of the activity should be clear as should what will happen to the photographs or videos. You must be able to justify images in your possession;
 - 61.2 all images should be made available to the Deputy Head in order to determine acceptability;
 - 61.3 images should not be made during one-to-one situations;
 - 61.4 ensure that the pupil is appropriately dressed;
 - 61.5 ensure that the pupil understands why the images are being taken and has agreed to the activity;
 - 61.6 only use equipment provided or authorised by the School;
 - 61.7 if a photograph or video is to be displayed in a place to which the public have access (e.g. on the School's website) it should not display the pupil's name unless specific consent has been obtained. If the use of a photograph or video is more privacy intrusive consent may need to be obtained even if the pupil's name is not used (e.g. using an unnamed photograph of a pupil in an advertisement). Consent should be obtained from the pupil and / or their parents as appropriate. Please see paragraph 62 below for further guidance on consent;
 - 61.8 all images of children should be stored securely and only accessed by those authorised to do so; and
 - 61.9 images must not be taken secretly.
- 62 **Consent:** Children are usually considered mature enough to exercise their own data protection rights when they are aged 12 years or older. Whether consent should be obtained from the parents, the pupil or both will depend on the age of the pupil. The School's policy is that when consent is required it should be obtained as follows:
- 62.1 where the pupil is in Year 7 or below, consent should be sought from a parent, guardian or carer;

- 62.2 where the pupil is in Year 8, 9, 10 or 11 then consent should be sought from both the pupil and their parent, guardian or carer;
 - 62.3 where the pupil is in Year 12 or 13 then only the pupil's consent will need to be obtained.
- 63 **Personal social media:** You must not publish anything which could identify pupils, parents or guardians on any personal social media account, personal webpage or similar platform. This includes photos, videos, or other materials such as pupil work.
- 64 **Appropriate material:** The School recognises that many children have unlimited and unrestricted access to the internet via 3G and 4G. You must ensure children are not exposed to inappropriate or indecent images. Viewing, retrieving or downloading of pornographic, terrorist or extremist material, or any other material which the School believes is unsuitable is strictly prohibited and constitutes gross misconduct. This includes at any time when on School premises or otherwise in the course of your employment, including using the School's ICT network, or via 3G or 4G, whether or not on a School or personal device. You should not allow unauthorised access to School equipment and should keep your computer passwords safe. If you discover material that is potentially illegal or inappropriate, you must isolate the equipment and contact the Designated Safeguarding Lead in accordance with the School's child protection and safeguarding policy and procedures immediately. Pupils must not be exposed to unsuitable material on the internet and Staff should ensure that any film or material shown is age appropriate.

Gifts and rewards

- 65 **Anti-bribery and corruption policy:** Before accepting or giving any gifts or rewards, Staff must familiarise themselves with the anti-bribery and corruption policy contained in this Employment Manual.
- 66 **If a gift is received:** If you receive a gift from a pupil or parent you should:
- 66.1 declare the gift where there is a possibility it could be misconstrued, or in any event where the gift is of a value of more than £50. The Head may in their absolute discretion require you to decline the gift; and
 - 66.2 decline outright gifts that could be perceived as a bribe or that have created an expectation of preferential treatment. Although it is accepted for parents, guardians or carers or children to make small gifts to show appreciation, you must not receive gifts on a regular basis or receive anything of significant value.
- 67 **Giving gifts and rewards:** Where you are thinking of giving a gift or reward:
- 67.1 it should only be provided as part of an agreed reward system;
 - 67.2 in all cases except the above, the gift or reward should be of little monetary value and should be discussed and agreed with the Deputy Head / Head and where appropriate the parent, guardian or carer;
 - 67.3 selection processes should be fair and where possible should be agreed by more than one member of Staff; and

67.4 gifts should be given openly and not based on favouritism.

- 68 **Allocation of gifts and rewards:** Decisions regarding entitlement to benefits or privileges such as admission to school trips, activities or classroom tasks must avoid perceptions of bias, grooming or favouritism. The selection process must be based on transparent criteria.

Childcare disqualification

- 69 **Offence:** The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009 state that it is an offence for the School to employ anyone to provide childcare in connection with our early years provision (**EYP**) or later years provision (**LYP**) who is disqualified, or for a disqualified person to be directly involved in the management of EYP or LYP (a **Relevant Role**).
- 70 **EYP** includes usual school activities and any other supervised activity for a "young child" which takes place on the school premises during or outside of the normal school day (a child is a "young child" during the period between birth and up to 1 September following their fifth birthday).
- 71 **LYP** includes provision for children not in EYP and under the age of 8 which takes place on school premises outside of the normal school day, including, for example breakfast clubs, after school clubs and holiday clubs. It does not include extended school hours for co-curricular activities such as sports activities.
- 72 **"Childcare"** means any form of care for a child, which includes education and any other supervised activity for a "young child". "Childcare" in LYP does not include education during school hours but does cover before and after school clubs.
- 73 **Grounds for disqualification:** The grounds on which a person will be disqualified from working in connection with EYP or LYP are set out in the School's recruitment, selection and disclosure policy and procedure. Staff are required to familiarise themselves with this document.
- 74 **Duty of disclosure:** Staff in a Relevant Role are under an on-going duty to immediately notify the School if their circumstances change so that they meet any of the criteria for disqualification at any point during their employment with the School. Any failure to disclose relevant information will be treated as a serious disciplinary matter.
- 75 **Ofsted:** Where the School receives disqualification information about a member of staff working in a Relevant Role and is satisfied that the member of staff may be disqualified as a consequence, the School is under a duty to report the circumstances of the disqualification to Ofsted.
- 76 **Waiver:** A member of staff who discloses information which appears to disqualify them from working in a Relevant Role may apply to Ofsted for a waiver of the disqualification.

Reporting Obligations

- 77 **The School's position:** 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.

- 78 **Exit interviews:** All staff are trained so that they understand they are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of their employment in accordance with the School's policies (including the whistleblowing policy, the child protection and safeguarding policy and procedures and this Code). Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance development reviews and appraisal and finally at exit interviews which are held with all leavers.
- 79 **Termination of employment:** If the School ceases to use the services of a member of Staff because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay. The School may also need to consider a referral to the Disclosure and Barring Service if a member of Staff is suspended, or deployed to another area of work that is not regulated activity.
- 80 **Resignation:** If a member of Staff tenders his or her resignation, or ceases to provide his or her services to the School at a time when child protection concerns exist in relation to that person, those concerns will still be investigated in full by the School and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met.
- 81 **Teaching Regulation Agency (TRA) (previously known as the National College for Teaching and Leadership):** Separate consideration will also be given to making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he or she not resigned) because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.