



## CHILD PROTECTION, SAFEGUARDING and STAFF CODE OF CONDUCT POLICY

### STATEMENT OF INTENT

The safety and welfare of all our pupils at Colfe's School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. In all matters relating to child protection the school will follow the procedures laid down by our own (or where appropriate the relevant child's) Local Safeguarding Children Partnership (LSCB) which is Greenwich, together with DfE guidance contained in Working Together to Safeguard Children (July 2018) and Keeping Children Safe in Education (September 2018). This policy is applicable to the whole school community, including those pupils in the Early Years Foundation Stage (EYFS) and considers at all times what is in the best interests of the child.

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves, and comply at all times with this policy. All school staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

### **KEY EXTERNAL CONTACT DETAILS**

<b>Local Authority Designated Officer Greenwich</b>	Catrin Gruffydd Jones TEL: 020 8921 2351 or 3930 EMAIL: <a href="mailto:childrens-LADO@royalgreenwich.gov.uk">childrens-LADO@royalgreenwich.gov.uk</a> catrin.gruffyddjones@royalgreenwich.gov.uk
<b>Local Authority Children's Social Services and Multi-Agency Safeguarding Hub</b>	<b>Bromley</b> TEL: 020 8461 7373/7379/7026 EMAIL: <a href="mailto:mash@bromley.gov.uk">mash@bromley.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 0300 303 8671 <b>Greenwich</b> TEL: 020 8921 3172/2267 EMAIL: <a href="mailto:mash-referrals@royalgreenwich.gov.uk">mash-referrals@royalgreenwich.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8854 8888 <b>Lewisham</b> TEL: 020 8314 6660 EMAIL: <a href="mailto:mashagency@lewisham.gov.uk">mashagency@lewisham.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM TEL: 020 8314 6000
<b>Support and Advice about Extremism</b>	<b>Police</b> Heather Hutchings

	<p>TEL: 020 8921 8324  EMERGENCY: 999  NON EMERGENCY NUMBER: 101  EMAIL: <a href="mailto:community-safety@royalgreenwich.gov.uk">community-safety@royalgreenwich.gov.uk</a></p> <p><b>Local Authority</b>  <b>Lewisham Prevent Team</b>  TEL: 07775 036482 or 07710 387930  EMAIL: <a href="mailto:prevent@lewisham.gov.uk">prevent@lewisham.gov.uk</a>  PREVENT LEAD:</p> <p><b>Greenwich Prevent Team</b>  TEL: 020 8921 8324  EMAIL: <a href="mailto:community-safety@royalgreenwich.gov.uk">community-safety@royalgreenwich.gov.uk</a>  PREVENT LEAD: Adam Browne</p> <p><b>Department for Education</b>  NON EMERGENCY NUMBER: 020 7340 7264  EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a></p>
<b>Police – Safer Schools</b>	<p>Debbie Lester PC 592RG  Eltham Police station  Well Hall RD  SE9 6SF  02082845710  8am – 4pm Mon – Fri 07789 944122  <a href="mailto:Debbie.J.Lester@met.police.uk">Debbie.J.Lester@met.police.uk</a></p>
<b>NSPCC Advice Line - general</b>	0808 800 5000
<b>NSPCC whistleblowing advice line</b>	<p>ADDRESS: Weston House, 42 Curtain Road London  EC2A 3NH  TEL: 0800 028 0285  EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>Disclosure and Barring Service</b>	<p>ADDRESS: PO Box 181, Darlington, DL1 9FA  TEL: 01325 953795  EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a></p>
<b>Teaching Regulation Agency (TRA)</b>	<p>ADDRESS: Ground Floor, South Cheylesmore House,  5 Quniton Road, Coventry CV1 2WT  TEL: 020 7593 5393  EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm)  EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a></p>

## KEY SCHOOL CONTACT DETAILS

<b>Governors</b>	<p><b>Chairman of Governors</b>  <b>(via Clerk to the Governors)</b>  Matthew Pellereau  TEL: 020 8463 8112</p>
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	<p>EMAIL: <a href="mailto:mpellereau@colfes.com">mpellereau@colfes.com</a></p> <p><b>Nominated Safeguarding Governor (via Clerk to the Governors)</b> Belinda Canham TEL: 020 8463 8112 EMAIL: <a href="mailto:bcanham@colfes.com">bcanham@colfes.com</a></p>
<p><b>Designated Safeguarding Lead (DSL) {and Deputy Designed Safeguarding Leads (DDSLs)}</b></p>	<p><b>Main DSLs for the School</b> <b>Jane German – Senior School</b> TEL: 020 8463 8142 EMAIL: <a href="mailto:jgerman@colfes.com">jgerman@colfes.com</a> <b>Catriona Macleod – Junior School</b> TEL: 020 8463 8240 EMAIL: <a href="mailto:cmacleod@colfes.com">cmacleod@colfes.com</a></p> <p><b>Deputy DSLs</b> <b>Senior school</b> <b>Christopher Morriss</b> TEL: 020 8463 8186 EMAIL: <a href="mailto:cmorriss@colfes.com">cmorriss@colfes.com</a> <b>Justin Worley</b> TEL: 020 8463 8190 EMAIL: <a href="mailto:jworley@colfes.com">jworley@colfes.com</a> <b>Elizabeth Biggs</b> TEL: 020 8463 8190 EMAIL: <a href="mailto:ebiggs@colfes.com">ebiggs@colfes.com</a> <b>Spencer Drury</b> TEL: 020 8463 8204 EMAIL: <a href="mailto:sdrury@colfes.com">sdrury@colfes.com</a></p> <p><b>Junior School</b> <b>Dawn France</b> TEL: 020 8463 8264 EMAIL: <a href="mailto:dfrance@colfes.com">dfrance@colfes.com</a> <b>Sue Gurr</b> TEL: 020 8463 8265 EMAIL: <a href="mailto:sgurr@colfes.com">sgurr@colfes.com</a></p> <p><b>EYFS DSL</b> <b>Catriona Macleod</b> TEL: 020 8463 8239 EMAIL: <a href="mailto:cmacleod@colfes.com">cmacleod@colfes.com</a></p>
<p><b>Designated Teachers for Looked After Children</b></p>	<p><b>Jane German – Senior School</b> TEL: 020 8463 8142 EMAIL: <a href="mailto:jgerman@colfes.com">jgerman@colfes.com</a> <b>Catriona Macleod – Junior School</b> TEL: 020 8463 8239 EMAIL: <a href="mailto:cmacleod@colfes.com">cmacleod@colfes.com</a></p>
<p><b>Head</b></p>	<p><b>Richard Russell</b> TEL: 020 8463 8102 EMAIL: <a href="mailto:head@colfes.com">head@colfes.com</a></p>

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## **POLICY STATEMENT**

This policy applies to Colfe's which includes the EYFS setting. This policy is reviewed and updated annually as a minimum and is available on the School website.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2018) ('KCSIE')
  - Disqualification under the Childcare Act 2006 (June 2016)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (July 2018)
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015 updated March 2016)
  - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
  - The use of social media for on-line radicalisation (July 2015)

This policy also takes into account the procedures and practice of Greenwich local authority as part of the inter-agency safeguarding procedures set up by the Greenwich Local Safeguarding Children Partnership.

## **CONCERNS ABOUT A CHILD**

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility.

The School has arrangements for listening to children and providing early help. We follow the guidance from Greenwich Early Help Partnership in relation to providing good quality early help based on our learning of what works.

### **Definitions of Safeguarding and Types and Signs of Abuse**

Safeguarding and promoting the welfare of children is defined 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.

Abuse is 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). Abuse can take place wholly online or technology may be used to facilitate online abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect.

Staff are referred to **Appendix I** of this policy for further detail of the types of abuse and possible signs of abuse.

## **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.}

All concerns, discussions and decisions together with reasons made under these procedures should be recorded in writing on a Child Welfare Concern Form found here: T:\301 - DIRECTOR OF PASTORAL CARE\Child Protection. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by speaking directly with the pupil and informing them of the next steps needed to ensure their safety. The School acknowledges the importance of the 'voice of the child' and operates its processes with the best interests of the pupil at their heart.

### **Early Help**

Any child may benefit from early help but all 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 showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited; and
- Is a privately fostered child.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the appropriate Safeguarding Children Partnership referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

### **What staff should do if they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

### **What staff should do if a child is in danger or at risk of harm**

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. **Anyone** can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Partnership is Greenwich. A full copy of their local procedures can be on their website: <https://www.royalgreenwich.gov.uk/site/>

### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

### **What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to **Appendix I** of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education are found in our Missing Child Policy which is used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found in the Missing Child Policy.

The School will report the appropriate Local Authority, normally Greenwich, a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

### **What staff should do if they have concerns about another staff member**

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) for Greenwich.

### **What staff should do if they have concerns about safeguarding practices in the school**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## **ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS**

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include sexting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. See Educational Visits Policy.

The School takes the following steps to minimise the risk of peer-on-peer abuse:

- effective implementation of the school's usual safeguarding and harmful and abusive behaviours (anti-bullying) policies (and recognition that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue);
- seeking advice from statutory agencies, as appropriate, and readiness to make a referral if an incident meets the referral threshold set by the Local Safeguarding Children Partnership;
- if a child is in immediate danger or is at risk of harm, an immediate referral to children's social care and/or the police;
- following the advice for practitioners in: *What to do if you're worried a child is being abused*;
- effective information sharing with any agencies or other professionals involved;
- where allegations of abuse or assault have been made against one or more of its own pupils, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all pupils and that both alleged victims and perpetrator pupils receive appropriate support. Decisions arising might include, for example, whether the accused pupil should be removed from school for a period, or from certain classes, whether contact with certain individuals should be prevented or supervised, the availability of counselling, the adequacy of arrangements for listening to children etc;
- good record keeping of related conversations, meetings and communications; and

- we also refer to guidance sent out in May 2018 by the government, [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Where an issue of pupil behaviour gives ‘reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm’, staff should follow the procedures below rather than the School’s Harmful and Abusive Behaviours (anti-bullying) and Behaviour Management policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the LCSB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. 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 LCSB, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the LCSB and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children’s social care and/or a report to the police against a victim’s wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

The School’s approach to sexting is in line with guidance set out by the government in [Sexting in schools and colleges](#), UK Council for Child Internet Safety

When an incident involving youth produced sexual imagery comes to a school’s attention:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate school staff;
- There should be subsequent interviews with the young people involved (if appropriate);
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm; and
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children’s social care and/or the police immediately.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims and perpetrators will be supported by pastoral staff and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.



## **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)**

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and Local Child Safeguarding Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children<sup>1</sup>.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head OR to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors, Matthew Pellereau, via the Clerk to the Governors, 020 8463 8112. Where the Head OR DSL is the subject of the allegation or concern, the Head OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and local authority designated officer.
2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.
3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency (TRA) and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
7. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

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

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

## **STAFF BEHAVIOUR POLICY / CODE OF CONDUCT**

The aim of the Staff Behaviour and Code of Conduct policy is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

### **POSITION OF TRUST**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should bear in mind that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 16 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, including their use of social media, and report and record any incident with this potential.

In general, pupils should be encouraged to discuss with their parents, or guardians, issues that are troubling them. It may be appropriate to suggest that a pupil sees the school counsellor or member of the medical staff.

Staff need to ensure that their behaviour does not inadvertently lay them open to allegations of abuse. They need to treat all pupils with respect and try, as far as possible, not to be alone with a child or young person. Where this is not possible, for example, in an instrumental music lesson, or sports coaching lesson, it is good practice to ensure that others are within earshot, and if there are no windows in the room the door should be left open. Where possible, a gap or barrier should be maintained between teacher and child at all times. Any physical contact should be the minimum required for care, instruction or restraint.

### ***Communication with Pupils***

Staff should not give their personal mobile phone numbers or email addresses to pupils, nor should they communicate with them by text message, personal email or personal social media sites. If they need to speak to a pupil by telephone, they should use one of the school's telephones and email using the school system. The group leader on all trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the pupils for their mobile numbers before allowing them out in small, unsupervised groups. The school mobile should be used for any contact with pupils that may be necessary. The group leader will delete any record of pupils' mobile phone numbers at the end of the trip or visit and should ensure that pupils delete any staff numbers that they may have acquired during the trip.

### ***Physical contact with pupils***

There are occasions when it is entirely appropriate and proper for staff to have physical contact with pupils, but it is crucial that they only do so in ways appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with pupils and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by pupils or onlookers.

A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be recorded as soon as possible, the DSP informed and, if appropriate, a copy placed on the pupil's file. It is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual.

### ***Positive Handling***

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to defuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the

DSP/Head who will decide what to do next. Where this relates to the school's EYFS setting, parents will be informed of any physical restraint used on their child the same day or as soon as reasonably practicable. Please see our school policy on restraint for further details.

### ***Physical education and other activities requiring physical contact***

Where exercises or procedures need to be demonstrated, extreme caution should be used if the demonstration involves contact with pupils and, wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with pupils in order to support a pupil so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the pupil's agreement.

Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

### ***Transporting pupils***

It is inadvisable for a teacher to give a lift in a car to a pupil alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting as an escort. If there are exceptional circumstances that make unaccompanied transportation of pupils unavoidable, the journey should be made known to a senior member of staff.

### ***Confidentiality***

Staff members should never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made

### **EQUAL TREATMENT**

We are committed to equal treatment for all pupils regardless of gender, sexual orientation, race, disability, religion or belief. We keep a record of racist incidents.

We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each pupil. Our staff undertake regular consultation activities with our pupils e.g. through questionnaires, participation in harmful behaviour activities and speaking to children about their experiences at lunchtime and play-times.

### **Harmful and Abusive Behaviours (Bullying)**

Harmful and abusive behaviour, harassment, victimisation and discrimination will not be tolerated. We treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of abusive behaviour is unacceptable and the school keeps a record of any incidents. Please see our school policy on harmful and abusive behaviours (anti-bullying) for further details.

## **DAILY CONDUCT REQUIREMENTS FOR STAFF**

### **Attendance and Timekeeping**

Should a staff member need to be absent or expect to be late for any reason, he/she should ask their Head of Department in advance when possible. If this is not possible, he/she is asked to contact the Head of Department at the earliest opportunity.

### **Smoking**

To promote a healthy and pleasant working environment and because of the fire risk, smoking is not allowed anywhere on site.

### **Alcohol and Illegal Drugs**

Consumption of illegal drugs is not permitted on site. Consumption of alcohol is not permitted on site save at a school function or where otherwise agreed when modest amounts of alcohol may be consumed. Employees conduct and performance must not be adversely impacted by alcohol or drugs when undertaking their duties. Please see the school's Alcohol and Illegal Drugs Policy for more details.

### **Security**

Staff must not remove any school documents from the site nor take any photographs without due permission. The school reserves the right to search the outer clothing, bags, lockers and vehicles etc. of staff members whilst on site. The staff member may have a colleague in attendance on such (rare) occasions.

### **Personal Appearance**

The school regularly receives visits from parents, potential parents and others, and naturally wishes to convey an impression of efficiency and organisation. Therefore, whilst not wishing to impose unreasonable obligations of staff they are, nonetheless, required to look smart in appearance.

### **Mobility and Flexibility**

Due to the demands and nature of the school, staff should be prepared to transfer upon request within departments either temporarily or permanently, to undertake work of a different nature, providing it is reasonable and safe to do so and the staff member is adequately trained.

## **ACCEPTABLE USE OF TECHNOLOGIES**

### **Use of Mobile Phones and Cameras**

Photography and video of pupils will be taken by staff for internal and external promotional use (Notice of Objection to school use of photography and video of a pupil must be provided in writing to the Director of Admissions and Communications). We may use external photographers / video for professional shots and videos under the direction of the Dir of Admissions and Communications. Photographs will only be taken by designated staff member/s. Where photographs are taken by staff to give evidence of children's progress, photos can only be taken on school cameras. They must then be downloaded onto school computers, where they will be monitored. Photos cannot be used or passed on outside the school. NO photos must be taken on a member of staff's personal electronic devices.

### **Social Media**

Staff are advised to closely and regularly monitor their presence on social media and to keep their privacy settings at their highest.

## **SAFER RECRUITMENT**

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Safer Recruitment Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out below:

### **VISITING SPEAKERS**

Colfe's School works with a multitude of external staff and visiting speakers to help us deliver a range of support and/or additional learning opportunities which will enable our students to develop and reach their potential. Any outside agencies/partners /consultants will be expected to provide proof of identification on the request of a Colfe's School member of staff. A checklist must be completed prior to an outside agencies/partners/consultants/visiting speaker working with students at Colfe's School.

All visitors working with pupils are vetted and, where appropriate, we will ask for evidence of their DBS clearance. A member of Colfe's staff will be present during sessions to support visitors and pupils.

A Checklist (see Appendix 2) is completed by visiting speakers and they are given a copy of our Safeguarding policy and KCSIE Guidance and are asked to read them.

## **MANAGEMENT OF SAFEGUARDING**

The Junior School's DSL, Catriona Macleod, and the Senior School's DSL, Jane German, are members of the leadership team.

Dawn France, Junior School DDSL, and Christopher Morriss, Senior School DDSL, (or one of the other DDSLs named in this policy) are the persons to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties, be responsible for the pupils' online safety and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors OR proprietor to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL or Deputy DSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ or DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are to contact the main school office (020 8852 2283) who will be able to direct the call to the appropriate person.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

## **TRAINING**

Induction and training are in line with advice from the LSCB.

### **All Staff**

All new staff will be provided with induction training that includes:

- the child protection policy;
- the role and identity of the DSL(s) and any DDSL;
- the behaviour policy;
- the staff code of conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE*; and
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE* (and Part five of *KCSIE*).

Copies of the above documents are provided to all staff during induction. Temporary staff and volunteers are provided with the above documents as well.

All staff are also required to:

- Read Part one of *KCSIE* and confirm that they have done so. Each time Part One of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email.
- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by insisting that they attend training and answer questions on the day after training, also to sign to confirm attendance.
- Receive training in safeguarding and child protection regularly, in line with advice from the LSCB, namely Greenwich. Training will include online safety and harmful sexual behaviours. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails and staff meetings.

### **DSL(s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children and training in the LSCB's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSLs are trained to the same level as the DSLs.

## **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Richard Russell is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. They are a member of the governing body.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The DSL will present an annual report to governors, citing statistics and anonymised cases in order that they can monitor the effectiveness of our safeguarding procedures and practices. The School draws on the expertise of staff, including the DSLs, in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

## **THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching children how to keep safe**

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHEE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's curriculum and also embedded in PSHEE and sex and relationships education (SRE).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School's systems, which may change from time to time include: application whitelisting (certain types of files are blocked); Iboss and Libra EVSA. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's Acceptable use Policy.

### **Looked after children**

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The DSLs are the designated members of staff responsible for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for Visiting Speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the



information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

See Appendix 2

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Pupils Acceptable Use Policy.

Photography and video of pupils will be taken by staff for internal and external promotional use (Notice of Objection to school use of photography and video of a pupil must be provided in writing to the Director of Admissions and Communications). We may use external photographers / video for professional shots and videos under the direction of the Dir of Admissions and Communications. Photographs will only be taken by designated staff member/s. Where photographs are taken by staff to give evidence of children's progress, photos can only be taken on school cameras. They must then be downloaded onto school computers, where they will be monitored. Photos cannot be used or passed on outside the school. NO photos must be taken on a member of staff's personal electronic devices.

In the Junior school mobile phones are not permitted to be used anywhere within the junior school buildings with the exception of school owned technology which is monitored. There must be no photography with in the swimming pool area and at school productions, which we will have filmed and a photographer present. Video/ photographic images of pupils can be taken by parents, carers or relatives at school events with in the grounds, on the basis that they are for private retention and not for publication in any manner, including use on personal websites.

Staff who wish to use take photographs or video of pupils (whether on a personal or school device) must first speak with the Head to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Head.

### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years' settings is Catriona Macleod.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

## **Appendix I Signs and symptoms**

Annex A contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

**Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made.**

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children missing from education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

### **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child sexual exploitation**

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;

- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Domestic abuse**

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

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

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse](#)

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published [joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation](#).

### So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

### FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

### Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’ safeguarding approach.

[Extremism](#) is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. [Radicalisation](#) refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

### The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

### Additional support

The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

There is additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

[Educate Against Hate](#), a website launched by the Her Majesty’s Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

### Channel

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. Guidance on Channel is available at: [Channel guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The school’s or college’s designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

### **Peer on peer abuse**

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) 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.

### **Sexual violence and sexual harassment between children in schools and colleges**

#### Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken

seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## **What is Sexual violence and sexual harassment?**

### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

*Rape:* A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

*Assault by Penetration:* A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

*Sexual Assault:* A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

### What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

### Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats



### The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 22 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

### **Additional advice and support**

<b>Abuse or Safeguarding issue</b>	<b>Link to Guidance/Advice</b>	<b>Source</b>
Abuse	<a href="#">What to do if you're worried a child is being abused</a>	DfE advice
	<a href="#">Domestic abuse: Various Information/Guidance</a>	Home Office
	<a href="#">Faith based abuse: National Action Plan</a>	DfE advice
	<a href="#">Relationship abuse: disrespect nobody</a>	Home Office website
Bullying	<a href="#">Preventing bullying including cyberbullying</a>	DfE advice
Children and the courts	<a href="#">Advice for 5-11-year olds witnesses in criminal courts</a>	Moj advice
	<a href="#">Advice for 12-17 year old witnesses in criminal courts</a>	Moj advice
Children missing from education, home or care	<a href="#">Children missing education</a>	DfE statutory guidance
	<a href="#">Child missing from home or care</a>	DfE statutory guidance
	<a href="#">Children and adults missing strategy</a>	Home Office strategy
Children with family members in prison	<a href="#">National Information Centre on Children of Offenders</a>	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	<a href="#">County Lines: criminal exploitation of children and vulnerable adults</a>	Home Office guidance
	<a href="#">Child sexual exploitation: guide for practitioners</a>	DfE
	<a href="#">Trafficking: safeguarding children</a>	DfE and HO guidance
Drugs	<a href="#">Drugs: advice for schools</a>	DfE and ACPO advice
	<a href="#">Drug strategy 2017</a>	Home Office strategy

	<a href="#">Information and advice on drugs</a>	Talk to Frank website
	<a href="#">ADEPIS platform sharing information and resources for schools: covering drug (&amp; alcohol) prevention</a>	Website developed by Mentor UK
“Honour Based Violence” (so called)	<a href="#">Female genital mutilation: information and resources</a>	Home Office
	<a href="#">Female genital mutilation: multi agency statutory guidance</a>	DfE, DH, and HO statutory guidance
	<a href="#">Forced marriage: information and practice guidelines</a>	Foreign Commonwealth Office and Home Office
Health and Well-being	<a href="#">Fabricated or induced illness: safeguarding children</a>	DfE, Department for Health and Home Office
	<a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a>	Public Health England resources
	<a href="#">Medical-conditions: supporting pupils at school</a>	DfE statutory guidance
	<a href="#">Mental health and behaviour</a>	DfE advice
Homelessness	<a href="#">Homelessness: How local authorities should exercise their functions</a>	HCLG
Online	<a href="#">Sexting: responding to incidents and safeguarding children</a>	UK Council for Child Internet Safety
Private fostering	<a href="#">Private fostering: local authorities</a>	DfE - statutory guidance
Radicalisation	<a href="#">Prevent duty guidance</a>	Home Office guidance
	<a href="#">Prevent duty advice for schools</a>	DfE advice
	<a href="#">Educate Against Hate Website</a>	DfE and Home Office
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice
	<a href="#">Ending violence against women and girls 2016-2020 strategy</a>	Home Office strategy
	<a href="#">Violence against women and girls: national statement of expectations for victims</a>	Home Office guidance
	<a href="#">Sexual violence and sexual harassment between children in schools and colleges</a>	DfE advice
	<a href="#">Serious violence strategy</a>	Home Office Strategy

## RELATED CHILD PROTECTION POLICIES

These policies are available upon request from the Headmaster's EA.

- Educational Visits Policy
  - Health and Safety Policy
  - Missing Child Policy
  - Safer Recruitment Policy
  - ICT Acceptable Use Policy
  - Physical Handling Policy
  - First Aid Policy
  - Harmful and Abusive Behaviours (Anti-bullying) Policy
  - Intimate Care Policy (Junior)
  - Behaviour Management Policy
  - Attendance Policy
  - Alcohol and Illegal Drugs Policy
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### *Appendix 2*

#### **Colfe's School**

#### **Working with School Visitors**

#### **Safeguarding Checklist**

Colfe's School works with a multitude of external staff and visiting speakers to help us deliver a range of support and/or additional learning opportunities which will enable our students to develop and reach their potential.

Any outside agencies/partners /consultants will be expected to provide proof of identification on the request of a Colfe's School member of staff.

The following checklist must be completed prior to an outside agencies/partners/consultants/visiting speaker working with students at Colfe's School.

#### **Instructions on how to complete this form:**

- 1. Please complete the form on pages 1 and 2 for each visiting speaker or group to the school who will have interaction with our students.**
- 2. You must provide the visitors with a copy of the Child Protection policy and Keeping Children Safe in Education (part 1) to the visitor prior to their arrival. Both documents can be found on the T drive.**
- 3. Details of controls / risk assessment undertaken is required if any of the following questions are answered No.**

<b>Details of Event:</b>	
<b>Name of Visitor(s):</b>	
<b>Name of the External Organisation:</b>	

<b>Lead Colfe's School Contact person:</b>			
<b>Date(s) visitor will be in school:</b>			
<b>Duration of Project/Meeting/Visit and exact times when visitor(s) will be in school:</b>			
<b>Key Information</b>	<b>Yes(v) No(X)</b>	<b>Comment (required if question is answered no)</b>	<b>Signature and Date</b>
1. Will the organisation be briefed about the Colfe's School Child Protection Policy?			
2. Have you checked for any recent published reports, statements or speeches made by the individual(s), and are you satisfied that the content is not in any way contrary to school policy or the ethos of inclusion in the school? Are you satisfied that no statements have been retracted or apologies publically given?  If any concerns exist, staff should refer these to the designated CP lead in the first instance.			
3. Please make a note of the DBS details (within the last three years) if available:  - Name of visitor: - DBS number: - Date of Issue:			
4. Will the individual(s) be left alone with students? (If the answer is "yes" your answer to question 2 and 3 should also be yes. If the answer to question 2 or 3 is "no" then the visitor must be accompanied by a member of Colfe's School staff at all times and details of how this will be achieved, entered in the comment box.)			
5. Will the provider be working alongside a member of Colfe's School staff? If Yes who?			
6. Have the organisation / individual(s) been briefed about the school procedures for signing in and signing out, and moving around our site?  ***If No this must be done prior to the organisation / individual(s) working in the school			
7. Have the organisation / individuals given you a copy of their own safeguarding /Child Protection Policy?			

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***If No consideration should be given as to whether this is required.			
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**What happens now?**

Give a copy of the completed Checklist to Anna Ross (Senior School) or Catriona Macleod (Junior School\*).

\*A copy of the completed form should be given to Anna Ross in the Bursary so details of the visitor can be recorded in the Central Register.

**Document updated May 2019**