



## 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 (LSCP) which is Greenwich, together with DfE guidance contained in Working Together to Safeguard Children (July 2018) and Keeping Children Safe in Education (September 2020). 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>	Rachel Walker TEL: 020 8921 2351 or 3930 Laura Lumbis TEL; 020 8921 2247 EMAIL: <a href="mailto:Childrens-Lado@royalgreenwich.gov.uk">Childrens-Lado@royalgreenwich.gov.uk</a> <a href="mailto:Rachel.Walker@royalgreenwich.gov.uk">Rachel.Walker@royalgreenwich.gov.uk</a> <a href="mailto:Laura.Lumbis@royalgreenwich.gov.uk">Laura.Lumbis@royalgreenwich.gov.uk</a>
<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

<p><b>Support and Advice about Extremism</b></p>	<p><b>Police</b> EMERGENCY: 999 NON EMERGENCY NUMBER: 101</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 and Heather Hutchings</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>
<p><b>Police – Safer Schools</b></p>	<p>Jodie Callaghan PC290RG Eltham Police station Well Hall RD SE9 6SF 02082845710 8am – 4pm Mon – Fri <a href="mailto:Jodie-Lee.Callaghan@met.police.uk">Jodie-Lee.Callaghan@met.police.uk</a></p>
<p><b>Police – CAIT team (Child Abuse Investigation Team) Greenwich</b></p>	<p>Bexley <a href="mailto:SEmailboxCAITreferralsBexley@met.police.uk">SEmailboxCAITreferralsBexley@met.police.uk</a> Greenwich <a href="mailto:SEmailboxCAITreferralsGreenwich@met.police.uk">SEmailboxCAITreferralsGreenwich@met.police.uk</a> Lewisham <a href="mailto:SEmailboxCAITreferralsLewisham@met.police.uk">SEmailboxCAITreferralsLewisham@met.police.uk</a></p>
<p><b>NSPCC Advice Line - general</b></p>	<p>0800 028 0285 8am – 8pm Mon - Fri <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<p><b>NSPCC Help line for people who have experienced abuse in education</b></p>	<p>0800 136 663 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<p><b>NSPCC whistleblowing advice line</b></p> <p><b>Government Advice</b></p>	<p>ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0808 800 5000 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p> <p><a href="https://www.gov.uk/whistleblowing">https://www.gov.uk/whistleblowing</a></p>
<p><b>Disclosure and Barring Service</b></p>	<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>
<p><b>Teaching Regulation Agency (TRA)</b></p>	<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>	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>
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## KEY SCHOOL CONTACT DETAILS

<b>Governors</b>	<p><b>Chairman of Governors (via Clerk to the Governors)</b> Matthew Pellereau TEL: 020 8463 8112 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>
<b>Designated Safeguarding Lead (DSL) {and Deputy Designed Safeguarding Leads (DDSLs)}</b>	<p><b>Main DSLs for the School</b></p> <p><b>Senior School</b> <b>Jane German</b> TEL: 020 8463 8142 EMAIL: <a href="mailto:jgerman@colfes.com">jgerman@colfes.com</a></p> <p><b>Junior School</b> <b>Victoria Welch</b> TEL: 020 8463 8246 EMAIL: <a href="mailto:vwelch@colfes.com">vwelch@colfes.com</a></p> <p><b>EYFS</b> <b>Sue Gurr</b> TEL: 020 8463 8265 EMAIL: <a href="mailto:sgurr@colfes.com">sgurr@colfes.com</a></p> <p><b>Deputy DSLs</b></p> <p><b>Senior school</b> <b>Christopher Morriss</b> TEL: 020 8463 8186 EMAIL: <a href="mailto:cmorriss@colfes.com">cmorriss@colfes.com</a></p> <p><b>Justin Worley</b> TEL: 020 8463 8190 EMAIL: <a href="mailto:jworley@colfes.com">jworley@colfes.com</a></p> <p><b>Elizabeth Biggs</b> TEL: 020 8463 8190 EMAIL: <a href="mailto:ebiggs@colfes.com">ebiggs@colfes.com</a></p> <p><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></p>

	<b>Emma Higgs</b> TEL : 020 8463 8266 (Junior Office) <a href="mailto:ehiggs@colfes.com">ehiggs@colfes.com</a>
<b>Designated Teachers for Looked After Children</b>	<b>Jane German – Senior School</b> TEL: 020 8463 8142 EMAIL: <a href="mailto:jgerman@colfes.com">jgerman@colfes.com</a> <b>Victoria Welch – Junior School</b> TEL: 020 8463 8246 EMAIL: <a href="mailto:vwelch@colfes.com">vwelch@colfes.com</a> <b>Sue Gurr - EYFS</b> TEL: 020 8463 8265 EMAIL: <a href="mailto:sgurr@colfes.com">sgurr@colfes.com</a>
<b>Head</b>	<b>Richard Russell</b> TEL: 020 8463 8102 EMAIL: <a href="mailto:head@colfes.com">head@colfes.com</a>

## 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 2020) ('KCSIE')
  - Disqualification under the Childcare Act 2006 (September 2018)
  - 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 physical and mental 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 **Annex I** of this policy for further detail of the types of abuse and possible signs of abuse. This is Annex A from Keeping Children Safe in Education 2020.

## **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 **Annex 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 Children Missing Education Policy which is used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found in the Children Missing Education 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) and peer on peer abuse 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), Peer on Peer Abuse 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 LCSP 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 LCSP, 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 LCSP 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 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.

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 door 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, they should ask their Head of Department in advance when possible. If this is not possible, they are 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 Annex 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 DSLs, Victoria Welch and Sue Gurr, 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 LSCP.

### **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 LSCP, 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 LSCP'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 relationships and sex education (RSE).

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. Pupils know that they will only connect to the school WiFi network to use the filtered internet and that they will not enable 3G/4G during school time for their own protection and to protect the privacy of staff and students.

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 Annex 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 Sue Gurr.

### **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).

### **Annex 1:**

#### **Further safeguarding information**

Annex A of KCSIE 2020 reads thus:

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 significant harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.**

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### **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, 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 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 can also be a sign of child criminal exploitation including involvement in county lines. 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 Education Policy procedures.

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

Approximately 200,000 children in England and Wales 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 Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- 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 Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and 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).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant. The department provide: Child sexual exploitation: guide for practitioners

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

## **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. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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.

## **Operation Encompass**

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

## **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional 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: [here](#).

### **So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour-based' abuse (HBA) 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 HBA 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 HBA, or already having suffered HBA.

#### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, 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<sup>104</sup> 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 may 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 perpetrators use perceived cultural practices 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, 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.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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 or the internet) and settings (such as within the home).

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 Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

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

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: [Channel guidance](#).

## **Additional support**

The department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel. Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

## **Peer on peer/ child on child 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): abuse within intimate partner relationships; 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 initiation/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 violence 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; • sexual exploitation; coercion and threats; and
  - upskirting.

### Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### 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 41 in Part one of KCSIE 2020. 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

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
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> <a href="#">Cyber bullying: advice for headteachers and school staff - DfE advice</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 Education from education, home or care	<a href="#">Children Missing Education 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 abuse" (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
Upskirting	<a href="https://www.gov.uk/government/news/upskirting-know-your-rights">https://www.gov.uk/government/news/upskirting-know-your-rights</a>	UK Government
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice
	<a href="#">Ending violence against women and girls 2016-2019 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
- Children Missing Education 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
- Peer on Peer Abuse Policy
- Relationships, Health and Sex Education Policy

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Annex 2

Colfe's School

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## 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(✓) 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 29			

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

### 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.

*Annex 3*

## Child protection during the COVID-19 measures – January 2021

### Context

The way schools and colleges are currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual. Most children are no longer in a school setting and staff numbers have been affected by the outbreak.

Schools have been asked to provide care for children who are vulnerable and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

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This Annex to our Child Protection policy sets out details of our safeguarding arrangements for:

1. Context
2. Version control and dissemination
3. Safeguarding priority
4. Current school position
5. Safeguarding partners' advice
6. Roles and responsibilities
7. Vulnerable children
8. Increased vulnerability or risk
9. Attendance
10. Reporting concerns about children and staff
11. Safeguarding training and induction
12. Safer recruitment/volunteers and movement of staff
13. Peer on peer abuse
14. Online safety
15. New children at the school
16. Supporting children not in school

### **Version control and dissemination**

This is version 2.0 of this annex. It will be reviewed by our DSL or a deputy DSL on a weekly basis as circumstances continue to evolve or following updated Department for Education advice or guidance. The updated current version is available on the school website here [www.colfes.com](http://www.colfes.com) for staff and parents.

We will ensure that on any given day all staff and volunteers in attendance will know who the DSL and deputy DSLs are and how staff and volunteers can speak to them.

### **Safeguarding priority**

During these challenging times the safeguarding of all children at our school – whether they are currently at home or in attendance – continues to be our priority. The following fundamental safeguarding principles remain the same:

- the best interests of children continue to come first
- if anyone in our school has a safeguarding concern, they will act immediately
- a designated safeguarding lead (DSL) or deputy DSL will always be available
- no unsuitable people will be allowed to gain access to children
- children should continue to be protected when they are online.

### **Current school position**

We have pupils on site and they are currently cared for in the junior and senior schools by the appropriate ratio of staff to pupils for compliance and safety reasons.

All staff and volunteers attending on site from outside our school will be made aware of safeguarding risks and know how to act if they have concerns.

A member of the safeguarding team is either on site or available remotely for consultation.

### **Safeguarding partners' advice**

We continue to work closely with our three safeguarding partners, and we will ensure this annex is consistent with their advice. This will include expectations for supporting children with education,

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mental and physical health, both mental and physical, and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need. The current advice is below.

As a school, Colfe's will continue to follow the usual safeguarding protocols and work closely to ensure pupil safety is paramount by working closely with the Royal Borough of Greenwich, our Local Safeguarding Children Partnership. We will continue to work with and support children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

### **Royal Borough of Greenwich**

#### **Guidance sent by Henrietta Quartano, Senior Assistant Director, Children's Safeguarding & Social Care:**

Over the whole of CSC we have identified the minimum number of staff who need to be in to provide an emergency service. This will be on a rota basis.

All allocated cases have been risk assessed as high, medium or low:

- **High cases:** Where we assess that we need to physically see children because of safeguarding concerns or placement stability. If we are unable to physically see them we will conduct robust video/phone "visits". Frequency will be determined on a case by case basis. Not all children on a Child Protection Plan will have been assessed as High risk.
- **Medium cases:** Video "visits" to be completed as above.
- **Low cases:** Weekly touch base calls with families to offer support

#### **MASH:**

MASH will operate a S47 child protection service and Covid 19 related emergencies only. Referrers on other levels of need will be informed to re-refer if safeguarding concerns emerge or if concerns remain at the end of the crisis.

**Assessment & Support Teams:** These teams will not be undertaking s17 threshold Child & Family Assessments but will complete Child Protection Investigations and Covid related emergencies only

**Child & Family in Need Teams:** These teams work with children on Child Protection Plans and Child in Need Plans. They will be visiting high risk cases and maintaining contact with others as detailed above.

**Care Teams:** These teams work with children in our care and will be visiting high risk children in our care and maintaining frequent contact with others.

**Care Leaver Teams:** We will be increasing our contact with Care leavers, mainly by phone unless in crisis

**Fostering and Adoption:** key activity will be supporting current carers to continue caring for our children, extending carers' numbers if we need more placements, agreeing emergency foster carer status for friends and family

### **We have made significant changes to Child Protection Conferences:**

#### **Initial Child Protection Conferences:**

- We will not be holding these as we are unlikely to get sufficient agencies present for safe decision-making and we cannot guarantee that due process will be followed.
- However, we must ensure that children at risk have clear safety plans.

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- If at the end of a child protection investigation the decision would have been to convene an Initial Child Protection Conference a Child Protection Chair will be allocated who, alongside the social worker, professional network and the family will develop a child safety plan.
  - This will include what other agencies will be doing to monitor children and progress the plan. The plan will be circulated to professionals and family.
  - These children will be made subject to a “Temporary Child Protection Plan” until a full service is resumed. This will ensure that these children are flagged with other services if, for example, they present at A&E.
  - These children will be given a “high” status. They will remain as far as possible with the social worker who completed the investigation.
  - There will be virtual Core Group meetings.

### **Review Child Protection Conferences (RCPC):**

- These will be held virtually with reports being submitted by all professionals and the Child Protection Conference Chair having discussions and updating the Child Protection Plan.
- Scheduled RCPCs will go ahead virtually through a series of phone conversations.
- All professionals who would normally attend the Conference should email their reports as normal to [CP\\_Conference\\_Admin@royalgreenwich.gov.uk](mailto:CP_Conference_Admin@royalgreenwich.gov.uk) five days before the RCPC date.
- The Child Protection Conference chair will speak with professionals and parents/children over 12 by phone on or before the RCPC date.
- The chair will have a discussion with the social worker and team leader on or before the RCPC date.
- The Chair will update the child protection plan on the basis of the reports and the discussions above within 24 hours of the RCPC date using a Decision Sheet amended for this period of time
- The Decision Sheet will be distributed within 24 hours of Virtual RCPC
- The next review conference will be scheduled in the normal way
- If the recommendation is to the end the CP plan we will need to consider this on a case by case basis – we will need to err on the side of not ending the plan and convening a review CPC for 3 months’ time

### **Reviews of children in our care:**

These will mirror the Review Child Protection Conference process and be held virtually.

All of these arrangements have been discussed and agreed by our Independent Scrutineer of the GSCP.

End of message.

### **Roles and responsibilities**

The roles and responsibilities for safeguarding in our school remain in line with our Child Protection Policy.

If possible, our DSL and at least one deputy DSL will be available on site during the school day. Where this is not possible, we will:

- have a trained DSL or deputy DSL available by phone and/or online video; or
- ensure we have access to a trained DSL or deputy DSL from another school or college by phone and/or online video.

Where our DSL or a deputy DSL cannot be on site, then in addition to one of the above options we will also ensure a senior leader from the school takes responsibility for co-ordinating safeguarding on site.

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Below are other ways that the teams can be contacted:

**Contact by email:**

DSLs and DDSPs are available via their school emails.

**Contact by phone:**

**Term time:**

For the junior school, call the school office on 020 8463 8266 and ask for a message to be sent to the relevant DSL, Sue Gurr EYFS or Victoria Welch junior school. They will then contact you directly for the details.

For the senior school, call the school office on 020 8852 2283 and ask for a message to be sent to the DSL, Jane German. She will then contact you directly for the details.

**During holidays:**

For the junior school, call the school office on 020 8463 8266 and ask for a message to be sent to the relevant DSL, Sue Gurr EYFS or Victoria Welch junior school. They will then contact you directly for the details.

For the senior school, call the school office on 020 8852 2283 and ask for a message to be sent to the DSL, Jane German. She will then contact you directly for the details. Or call her direct on her school mobile 07823 347600.

**Vulnerable children**

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans.

Those who have a social worker include children who have a child protection plan and those who are looked after by the local authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

There is an expectation that vulnerable children who have a social worker will attend school, so long as they do not have underlying health conditions that put them at risk. Where a parent does not want their child to attend school, and their child is considered vulnerable, we will discuss this with the social worker and explore the reasons for this directly with the parent.

Those with an EHC plan will be risk-assessed in consultation with the local authority and parents to decide whether they need to continue to be offered a school place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

We will encourage our vulnerable children and young people to attend school, including remotely if needed.

Senior leaders in our school, especially the DSL (and deputies) know who our most vulnerable children are, and they have the flexibility to offer a place to those on the edge of receiving children's social care support.

We will continue to work with children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

**Increased vulnerability or risk**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Staff will be aware of this in setting expectations of pupils' work where they are at home. Where we are providing for children of critical workers and vulnerable children on site, we will ensure appropriate support is in place for them.

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Our staff and volunteers will be aware of the mental health of a pupil who is a cause for concern and will contact the DSL or a deputy if they have any concerns.

## **Attendance**

Where a child is expected but does not arrive at school, we will follow our attendance procedure and attempt to contact the family. If contact cannot be made, the DSL or a deputy DSL will be informed.

The DSL or a deputy will attempt to contact the parents through various methods, such as telephone, email or by contacting a relative in the first instance. If contact cannot be made or if the DSL or a deputy DSL deems it necessary, we will undertake a home visit or ask an appropriate agency to do so. A risk assessment will be carried out before any such visit is made to ensure staff and the family are not put at risk.

Where a vulnerable child does not take up their place, we will notify their social worker.

## **Reporting concerns about children or staff**

The importance of all staff and volunteers acting immediately on any safeguarding concerns remains. Staff and volunteers will continue to follow our Child Protection procedures [\[insert link\]](#) and advise the DSL of any concerns they have about any child, including those who are not attending school.

The varied arrangements in place as a result of the COVID-19 measures do not reduce the risks that children may face from staff or volunteers. As such, it remains extremely important that any allegations of abuse made against staff or volunteers attending our school are dealt with thoroughly and efficiently and in accordance with our Allegations Against Staff Policy.

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

Our current policy states:

*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.*

It is important that staff and volunteers act immediately on any safeguarding concerns. The above procedure should be adhered to by staff and volunteers.

## **What to do if staff or volunteers have a concern about a member of staff or volunteer who may pose a safeguarding risk to children:**

Our policy currently states:

*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.*

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Staff and volunteers should continue to follow this guidance and follow the detailed advice of the main school safeguarding policy and KCSIE Sept 2020.

### **Staff training and induction**

For the duration of the COVID-19 measures, our DSL and deputy DSLs are unlikely to receive their refresher training. In line with government guidance, our trained DSLs and deputy DSLs will be classed as trained even if they cannot receive this training.

All current school staff have received safeguarding training and have read Part One and Annex A of Keeping Children Safe in Education. When new staff are recruited or volunteers join us, they will receive a safeguarding induction in accordance with our Child Protection Policy.

If staff from another setting attend the school site then, in line with government guidance, we will not undertake any additional safeguarding checks if the setting providing those staff confirm that:

- the individual has been subject to an enhanced DBS and children's barred list check and, that in the opinion of that setting, nothing resulted from those checks that provided any caused for concern
- there are no safeguarding investigations into the conduct of that individual
- the individual remains suitable to work with children.

### **Safer recruitment/volunteers and movement of staff**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children.

When recruiting new staff, we will continue to follow our Safer Recruitment policy.

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

For volunteers we will continue to follow the checking and risk assessment process set out in paragraphs 167 to 172 of Keeping Children Safe in Education 2020. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to engage in regulated activity.

It is essential from a safeguarding perspective that we are aware, on any given day, which staff/volunteers are on our school site and that the appropriate checks have been carried out on those individuals. We will continue to maintain our single central record (SCR) during these measures to ensure we have this awareness.

### **Peer on peer abuse – revised process**

We recognise that children can abuse their peers and our staff are clear about the school's policy and procedures regarding peer on peer abuse. All peer on peer abuse is unacceptable and will be taken seriously. We also recognise that abuse can still occur during a school closure or partial closure and between those children who do attend the school site during these measures.

Our staff will remain vigilant to the signs of peer-on-peer abuse and will follow the process set out in our Child Protection Policy  
Our policy currently states:

*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.*

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At the current time, we need to be particularly mindful of online behaviour and have set up protocols for pupils and staff to follow which mirror the good practice of safeguarding. We have also sent guidance to parents regarding how they can monitor their child's online world, both the learning environment and social one. Recommendations include the NSPCC website.

Staff will remain available to parents and pupils to consult over welfare and well-being concerns and will liaise with the relevant pastoral leader who will offer support and guidance to resolve the concern.

### **Online safety**

It is likely that children will be using the internet and engaging with social media far more during this time. Our staff are aware of the signs of cyberbullying and other online risks and our filtering and monitoring software remains in use during this time to safeguarding and support children.

Our staff will follow the process for online safety set out in our Child Protection Policy.

Staff who interact with children online will continue to look out for signs a child may be at risk. If a staff member is concerned about a child, that staff member will follow the approach set out in this annex and report that concern to the DSL or to a deputy DSL.

Staff and pupils will follow the protocols set up by senior management and circulated for compliance.

### **New children at the school**

Children may join our school from other settings. When they do, we will seek from those settings the relevant welfare and child protection information. This is relevant for all children that join us, but it will be especially important where children are vulnerable.

For vulnerable children we will ensure we understand the reasons for the vulnerability and any arrangements in place to support them. As a minimum we will seek access to that child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is).

Ideally this will happen before a child arrives but where that is not possible it will happen as soon as reasonably practicable.

Any exchanges of information will ideally happen at DSL (or deputy) level, and likewise between special educational needs co-ordinators/named individual with oversight of SEN provision for children with EHC plans. However, it is acknowledged this may not always be possible. Where this is the case our school senior leaders will take responsibility.

The DSL will undertake a risk assessment based on the information received, considering how risks will be managed and which staff need to know the information.

### **Supporting children not in school**

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive additional pastoral support in school, they will ensure that a communication plan is in place to support that child. Details of that plan will be recorded in the safeguarding file for that child. It will be reviewed regularly to ensure it remains current during these measures.

### **Help and Support**

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## Staff

The Dof E COVID -19 helpline is available to answer questions:

Email [DfE.coronavirushelpline@education.gov.uk](mailto:DfE.coronavirushelpline@education.gov.uk)

Telephone 0800 046 8687

Lines are open Monday to Friday from 8am to 6pm and weekends 10am to 4pm.

<https://swgfl.org.uk/resources/safe-remote-learning/>

<https://static.lgfl.net/LgflNet/downloads/digisafe/Safe-Lessons-by-Video-and-Livestream.pdf>

<https://www.saferinternet.org.uk/helpline/professionals-online-safety-helpline>

<https://www.saferrecruitmentconsortium.org/>

## Pupils

Practical support for keeping safe can be found at:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse
- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

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