



CITY OF LONDON SCHOOL FOR GIRLS

SAFEGUARDING AND CHILD PROTECTION POLICY

City of London School for Girls – Safeguarding Contact Sheet	
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City and Hackney Safeguarding Children Partnership	City of London: 020 7332 3621 Hackney: 020 8356 5500
City of London Children & Families Team (Social Care)	020 7332 3621 and 020 8356 2710 (out of hours emergencies) children.duty@cityoflondon.gov.uk

DfE Counter-extremism online reporting	Report Extremism in Education - Start Channel helpline: 020 7340 7264
Out-of-Hours	Contact Susannah Gilham (gilhams@clsg.org.uk) – an out of office message will explain how to get in touch with her or another member of the safeguarding team. If your concern requires an urgent response because a child is at risk of immediate and significant harm, please contact the police or your local authority Multi-Agency Safeguarding Hub (MASH).

Contents

		Page
1.	Introduction and Aims	3
2.	Procedures	6
3.	Roles and Responsibilities	12
4.	Supporting children and confidentiality	15
5.	Dealing with allegations of abuse against staff	2
6.	Dealing with allegations of abuse by one or more pupil/s against another pupil (child-on-child abuse) (see also Annex E on sexual violence and harassment)	24
7.	Supporting staff	26
8.	Whistleblowing	26
9.	Physical intervention	27
10.	Equalities and bullying	27
11.	Prevention	28
12.	Private fostering	29
13.	Children who go missing from education	29
16.	Health & Safety, IT and related school policies & procedures	30
	Annex A: TYPES OF ABUSE AND POSSIBLE SIGNS OF ABUSE	33
	Annex B: AWARENESS OF FEMALE GENITAL MUTILATION (FGM), CHILD SEXUAL EXPLOITATION (CSE), FORCED MARRIAGE (FM) AND HONOUR BASED ABUSE	38
	Annex C: STAFF SAFEGUARDING CODE OF CONDUCT	42
	Annex D: PREVENT DUTY	48
	Annex E: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT	55
	Annex F: CRIMINAL EXPLOITATION OF CHILDREN	59
	Annex G: PROCEDURE FOR DEALING WITH SELF-HARM	60
	Annex H: GUIDANCE ON RESPONDING TO A CHILD MAKING AN ALLEGATION OF ABUSE	64
	Annex I: PROCEDURE FOR REPORTING A CONCERN	65
	Annex J: PASTORAL REFERRAL PROCEDURE	67
	Annex K: DESIGNATED SAFEGUARDING LEAD JOB DESCRIPTION	69
	Annex L: Safeguarding (including behaviour and attendance) of pupils at City Junior School, from September 2023	73

Statement

We ‘The School’ are committed to safeguarding and promoting the welfare of children and expect all staff, governors and volunteers to share this commitment.

1. Introduction and Aims

1.1 This policy has been prepared in accordance with the requirements of:

- 1.1.1 Relevant legislation, including [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children; the [Education Act 2002](#), and the Education (Independent School Standards) (England) Regulations 2014.
- 1.1.2 Relevant statutory guidance issued by HM Government, including “Keeping Children Safe in Education” September 2023. All staff are issued with the summary guidance of this document which includes Part 1 of the guidance notes.

Other official documents taken into consideration when formulating this policy include:

- [Working Together to Safeguard Children \(2023\)](#)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)

- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- [What to do if You are Worried a Child is Being Abused](#) March 2015
- [SEND Code of practice](#) September 2020
- [Mental Health and Behaviour in Schools](#) 2022
- [Information Sharing: Advice for Practitioners](#) July 2018
- [Use of Reasonable Force in Schools](#) July 2013
- [Searching, Screening and Confiscation](#) July 2022
- [Pan London Child Protection Procedures"](#) 2023
- [Relationships, Sex and Health Education](#) September 2021 and the [Ofsted Review of Sexual Abuse in Schools and Colleges 2021](#).
- Other relevant standards and guidance, including guidance issued by the Independent Schools Inspectorate entitled – [Handbook for the Inspection of Schools, The Regulatory Requirements](#), September 2023.

1.1.3 Relevant Local Safeguarding Partnership Procedures, the City of London Prevent Strategy and the City of London Prevent Information Sharing Agreement. The Designated Safeguarding Lead (DSL) and the two Deputy Designated Safeguarding Leads (DDSL) regularly attend meetings of the City and Hackney Safeguarding Children Partnership.

1.2 This policy has been prepared in consultation with the City and Hackney Safeguarding Partnership.

1.3 The Governing Body takes seriously its responsibility under section 157 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other

agencies to ensure adequate arrangements within the School to identify, assess, and support those children where there are concerns about a child's safety and welfare.

- 1.4 There are three broad categories of concern about pupils: children in need, children who are at risk of harm and children who have suffered, or are suspected of suffering, abuse. This policy covers all three categories.
- 1.5 We recognise that all adults, including staff, volunteers and governors, have a full and active part to play in protecting pupils from harm, and that the child's welfare is our paramount concern. Wherever the word "staff" is used, it covers ALL on site, including temporary and support staff, contractors' employees working regularly on the School's premises, and volunteers working with children. Wherever the term "school staff" is used, it covers ALL staff directly employed by the City of London Corporation. Further information on contractor employees is given in paragraph 2.1.17.
- 1.6 The School, through its governors and staff, is committed to providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- 1.7 The aims of this policy are:
 - 1.7.1 To support each child's development in ways that will foster awareness, understanding, security, confidence, resilience and independence.
 - 1.7.2 To ensure that decisions about appropriate actions are always taken with consideration for the best interests of the child.
 - 1.7.3 To facilitate an understanding of the early help process and to help staff identify emerging problems so they can act on them by liaising with the DSL and by sharing information with other professionals.
 - 1.7.4 To provide an environment in which all children and young people feel safe, secure, valued and respected, and also feel confident to approach adults if they are in difficulties believing they will be effectively listened to.
 - 1.7.5 To raise the awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases, or suspected cases, of abuse including radicalisation, child-on-child abuse, child sexual exploitation and female genital mutilation. NB – although the usual procedure is for staff who have safeguarding concerns to alert the DSL or DDSL of them, it is the responsibility of all staff to report any suspicions they have, by-passing the DSL/DDSL if necessary and going straight to the LADO.
 - 1.7.6 To promote a culture of 'it could happen here' and to support staff who act as whistleblowers in raising concerns about poor or unsafe practice and potential failures in the school safeguarding regime.

- 1.7.7 To provide a systematic means of monitoring children known or thought to be at risk of harm, including the risk of being drawn into terrorism and extremism, child sexual exploitation or female genital mutilation, and ensure we, the school, contribute to assessments of need and support packages for those children.
 - 1.7.8 To emphasise the need for good levels of communication between all members of staff.
 - 1.7.9 To develop a structured procedure within the school, which will be followed by all members of the school community in cases of alleged or suspected neglect, abuse and/or any other child welfare concern.
 - 1.7.10 To develop and promote effective working relationships with other agencies, especially the Police, the City and Hackney Safeguarding Children Partnership, Community and Children Services, and the relevant Prevent Coordinators within Community Safety Partnerships.
 - 1.7.11 To ensure that all adults within the school who have the opportunity to have contact with children have had Disclosure and Barring Service (DBS) checks in accordance with the safeguarding requirements in this policy and as required by law. This includes relevant checks on adults involved in childcare activities at the School who could be subject to disqualification by association.
 - 1.7.12 To ensure that all visiting speakers to the school have been appropriately vetted and are supervised in accordance with the Prevent Duty to protect children from radicalisation by being drawn into terrorism and extremism.
- 1.8 This policy and its appendices are reviewed annually by governors and are kept under constant review by the school. Should any deficiencies or weaknesses in child protection arrangements become apparent, the arrangements will be remedied without delay. It is reviewed and kept up-to-date with safeguarding issues as they emerge and evolve, including lessons learnt.

2. Procedures

- 2.1 The school recognises that there is a difference between children who have suffered or are likely to suffer harm or are at risk of radicalisation who will require immediate action, and those whose needs fall below the threshold for immediate intervention but who nonetheless require additional support from one or more agencies. The former will be reported to City of London Children and Families Team (children's social care) immediately. The latter, who can be described as children in need, will be supported by inter-agency assessment using referrals under CAF (Common Assessment Framework) procedures when appropriate and working with other agencies as part of the Team Around the Child (TAC) and Channel panels. Our School procedures for safeguarding children have

been prepared in accordance with relevant legislation, guidance and Pan London Child Protection Procedures. The school does not require parental consent for referrals to statutory agencies. Contact details are set out at the beginning of the document. We will ensure that:

- 2.1.1 Arrangements are in place at the school to deal with cases and allegations of abuse, or suspected abuse, including radicalisation, child sexual exploitation and female genital mutilation, which will be referred to the local authority designated officer or team of officers (hereafter known as the LADO), who provide advice and will preside over any investigation of any allegation or suspicion of abuse directed at anyone working at the school. In the case of serious harm or if a crime may have been committed, police will be informed from the outset. The School will engage with the police, other statutory agencies and professionals, as necessary, to provide inter-agency support to the child concerned.
- 2.1.2 If a member of staff discovers (either through disclosure by the victim or visual evidence) that female genital mutilation appears to have been carried out in a girl under 18, the teacher and the school will comply with their obligatory duty to report this information to the police.
- 2.1.3 The school assesses regularly and reviews the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding, shared with strategic partners, of the risk on the local area. Appropriate referrals will be made in accordance with the School's local safeguarding partnership referral procedures. The school will consider whether it is appropriate to make a referral to the Channel Programme, in accordance with Channel Guidance, February 2021.
- 2.1.4 The school recognises that as well as needing to safeguard children who are at risk of harm, it needs to identify children who would benefit from early help and give support and advice to them, working with other agencies as necessary. The school is fully committed to making referrals under CAF (Common Assessment Framework) procedures when appropriate and to working with other agencies as part of the Team Around the Child (TAC) and Channel panels.
- 2.1.5 All members of the Governing Body understand the need for and fulfil their responsibilities under this Policy and are provided with a copy of this Policy and a copy of "Keeping Children Safe in Education" September 2023 upon their appointment to the Governing Body. There is one nominated governor who is responsible for child protection and who has skills commensurate for this role and their details are set out at the beginning of this document. The City of London will undertake to ensure that relevant training is provided for governors.

- 2.1.6 The School has a designated senior member of staff from the school leadership team, our Designated Safeguarding Lead (DSL), who has undertaken relevant child protection training delivered through local safeguarding partnership representative and this training is updated at least every two years. Details of the DSL are set out at the beginning of this document.
- 2.1.7 There will be two additional members of school staff (the Deputy Designated Safeguarding Leads or DDSLs) who will act in place of the designated DSL when absent and must receive relevant child protection training and this training is updated at least every two years. One of the DDSL is also the Prevent lead and has received suitable Prevent awareness training and the other is trained as the Lead for Looked After Children. Other members of the pastoral team will also receive appropriate child protection training. Details of the DDSLs are set out at the beginning of this document.
- 2.1.8 All staff are provided with relevant Child Protection Awareness information and Child Protection training INSET in accordance with the local safeguarding partnership and at least once a year to provide them with the skills and knowledge to safeguard children effectively, developing their understanding of the signs and indicators of abuse, along with their individual responsibilities to respond to any child welfare concerns in accordance with the school's child protection procedures. As part of this, all staff must read Part 1 of the "Keeping Children Safe in Education" September 2023 guidance documentation and confirm in writing that they have undertaken to do this. School leaders and those staff that work directly with children should also read Annex B. All staff should be aware of their role in the local early help process. All staff understand the need to avoid asking leading questions of children when a child protection matter is brought to the staff member's attention. The school must also refrain from undertaking an investigation without first consulting the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations.
- 2.1.9 All Staff have the opportunity to contribute and shape safeguarding arrangements and child protection policy, building on their expertise in dealing with children on a daily basis.
- 2.1.10 All new members of staff will have the roles of the DSL and DDSLs explained to them and will be given a copy of this policy and its annexes (including Staff Code of Conduct), the Behaviour Management policy, the Children Missing Education Policy, the IT and eSafety Policy, the City of London Corporation Whistleblowing procedures, and the Department for Education procedures, "Keeping Children Safe in Education September 2023", with the DSL and DDSL names clearly displayed, as part of their induction into the School and proof of induction is held on their staff file. Speakers and volunteers are provided with an abridged version of the Safeguarding policy which includes the contact details of the DSL, the DDSLs and the LADO.

- 2.1.11 When children attend educational activities offsite, the school strives to ensure their safety by making sure that school's staff supervise them and that assurances are sought that staff of other organisations have been checked for suitability. Further details are in the Educational Visits Policy and its annexes.
- 2.1.12 All members of staff and governors are advised on how to respond to 'Disclosures of Abuse' through relevant child protection awareness training. In particular training will ensure that they understand the need to: consider measures that may be necessary to protect individual pupils; avoid asking leading questions of pupils; avoid giving inappropriate guarantees of confidentiality; make and keep written records; and report the matter to the DSL or the DDSL. In the event the disclosure is a matter that involves a member of staff, this should be reported to the Headmistress who will inform the LADO. If the disclosure involves the Headmistress herself, the member of staff will report the matter to the Chairman of Governors who will report it to the LADO. All staff and governors are explicitly trained in the importance of ensuring that victims are taken seriously when disclosures are made: "All staff should be able to reassure victims 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 abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report." (Keeping Children Safe in Education September 2023)
- 2.1.13 Everyone in the school, including pupils, are also made aware that, while the normal referral route is through the DSL, they have a duty to report concerns directly to the LADO if they feel that the school has made an inadequate response to their concerns. In effect, anyone can make a referral.
- 2.1.14 Safer recruitment practices are always followed through rigorous recruitment process and procedures for Staff, striking a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. Our selection and recruitment of staff includes relevant criminal record checks, provided by the Disclosure and Barring Service (DBS) for their suitability for work and the receipt of barred list checks for new staff, and checks of the Prohibited Lists from teaching and from management. All staff who have the opportunity to come into contact with pupils, including contracted support staff such as cleaners and caterers, will be required to have a criminal records check on appointment and join the DBS update service. These checks will also be carried out on existing staff with a break in service of more than three months or where staff have, since their initial appointment to a position not requiring a disclosure, moved to work that involves significantly greater responsibility for children. Criminal record checks for governors will be undertaken in accordance with regulatory requirements. There is a separate Recruitment Policy which provides further details.

2.1.15 Where we have grounds for believing that a member of staff may be unsuitable to work with children that this is notified to the appropriate bodies including the DBS. In some cases, a referral may be made to both the DBS and Teaching Regulation Agency (TRA). The School will, as soon as possible and, in any event, within one month, report to the DBS anyone whose services are no longer used, whether because the School has removed them from work with children or the person has chosen to cease work, and there are grounds to believe they are unsuitable to work with children; and ensure that any allegation is followed up in accordance with statutory guidance.

Where there have been concerns about a member of staff which have not reached the threshold for referral to the DBS, the school will consider a referral to the TRA, following the advice in 'Teacher Misconduct: the prohibition of teachers' October 2015. A referral will be made to the TRA where a teacher has been dismissed for misconduct or would have been dismissed had he or she not resigned first.

2.1.16 All parents/carers are made aware of the responsibilities of staff with regard to child protection procedures through publication of the School's Child Protection Policy on the School website, and reference to it in our introductory school pack. The policy is also available upon request to the school. Summaries of safeguarding procedures are posted in classrooms for the information of pupils.

2.1.17 Where a contractor's employees visit the school premises irregularly and are therefore not subject to the same requirements as contractors' employees working regularly on site (as set out otherwise in this policy), relevant written assurances are obtained from the contractor that all staff have had a criminal records check within the past three years. Information regarding these checks will be provided by the contractor to the school upon request. Contracts require on-going monitoring and audit of the eligibility of those employees to work with children and any subsequent concerns arising which would affect their continued eligibility must be disclosed immediately to the City of London Corporation. Any allegation of abuse will be dealt with in accordance with the Pan London Child Protection Procedures.

2.1.18 Written assurance is obtained that any staff employed by another organisation and working with the school's pupils on another site have had a criminal records check within the past three years.

2.1.19 In response to KCSIE 2023, our lettings policy will seek to ensure the suitability of adults working with children on the school site at any time. Where school premises are used by outside bodies who are not working with children, there will be sufficient safeguards in place to protect the health, safety and welfare of pupils and to have due regard to the Prevent duty to avoid school facilities being used as a platform for extremism. Measures will also be in place to protect

against the interruption of pupils' education by third party users of the school's premises.

- 2.1.20 All community users are made aware of the school's child protection policy and those working with children understand the school's child protection guidelines and procedures.
 - 2.1.21 Where appropriate, senior pupils given positions of responsibility over other pupils will be briefed on appropriate action to take should they receive any allegations of abuse.
 - 2.1.22 All visiting speakers are suitably vetted by a member of staff prior to their visit and are supervised by a member of staff during their time at school. Further details are set out in Annex 4.
 - 2.1.23 The use of technology has become a significant component of many safeguarding issues. The DSL is responsible for overseeing Filtering and Monitoring and will work with the eSafety coordinator and the Director of IT to reduce opportunities for harm and to promote effective education. Further detail is in the Online Digital Esafety Policy.
 - 2.1.24 Annex B to this document deals with the specific issues of Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage and Honour Based Abuse. The school recognises and understands that these are all forms of abuse covered by this policy and would trigger the school's referral procedures.
 - 2.1.25 Annex E covers child-on-child sexual violence and sexual harassment. These issues will always be taken seriously and are never acceptable as 'banter' or teasing.
- 2.2 Our procedures will be reviewed annually by the board of Governors. The review will also include a review of the efficiency with which the related duties have been discharged, or deficiencies (if any) have been rectified.
- 2.3 The names of the DSL and DDSLs are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse and/or risk to a child. The DSL and DDSLs have regular meetings to discuss effective safeguarding. If the DSL is absent, referrals should be made to a DDSL or the Headmistress.
- 2.4 For incidents which occur out of hours, an email should be sent to the DSL and the Headmistress who will take action as soon as possible. In emergencies, the police or social services should be contacted immediately.
- 2.5 The current contact details of all those involved in child protection are listed at the beginning of this document. At induction, Staff must sign to say they have read these documents. As the policy is updated annually and training is delivered, new and current staff must complete training and a test to demonstrate they have understood any changes.

- 2.6 A single central record is held detailing all staff (and volunteers) employed by the School and the relevant safeguarding checks undertaken.

3. Roles and Responsibilities

- 3.1 Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

3.2 All staff will:

- 3.2.1 Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- 3.2.2 Complete an online test at the beginning of each academic year to demonstrate that they have understood and reviewed the guidance
- 3.2.3 Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- 3.2.4 Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

3.3 All staff will be aware of:

- 3.3.1 Our systems which support safeguarding, including this Child Protection and Safeguarding Policy, the Staff Code of Conduct (Annex C), the role and identity of the designated safeguarding lead (DSL) and the deputy designated safeguarding leads (DDSLs), the Behaviour Policy, and the safeguarding response to children who go missing from education.
- 3.3.2 The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- 3.3.3 The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- 3.3.4 What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- 3.3.5 The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent

crime, FGM, radicalisation and serious violence (including that linked to county lines).

- 3.3.6 The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- 3.3.7 The fact that children can be at risk of harm inside and outside of their home, at school and online.
- 3.3.8 The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- 3.3.9 What to look for to identify children who need help or protection.

3.4 The Designated Safeguarding Lead (DSL)

3.4.1 The DSL is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes responsibility for online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. A full job description for the DSL can be found in Appendix K.

3.4.2 During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

3.4.3 When the DSL is absent, the DDSLs will act as cover.

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

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

3.4.5 The DSL will also:

- Keep the Headmistress informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search.

3.5 The Governing Board

The Governing Board will:

- 3.5.1 Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- 3.5.2 Annually review, evaluate and approve this policy, ensuring it complies with the law, and hold the Headmistress to account for its implementation. This will also include a review of the efficiency with which the related duties have been discharged, or deficiencies (if any) have been rectified.
- 3.5.3 Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school’s local multi-agency safeguarding arrangements.
- 3.5.4 Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- 3.5.5 Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- 3.5.6 Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE’s filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- 3.5.7 Make Sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place

- The School has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors)
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognized.

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

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and is following KCSIE 2023 regulations, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

3.5.9 The chair of governors will act as the ‘case manager’ in the event that an allegation of abuse is made against the Headmistress, where appropriate.

3.5.10 All governors will read Keeping Children Safe in Education in its entirety.

3.6 The Headmistress

The Headmistress is responsible for the implementation of this policy, including:

3.6.1 Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

3.6.2 Communicating this policy to parents/carers when their child joins the school and via the school website

3.6.3 Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

3.6.4 Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

3.6.5 Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

4. Supporting Children

4.1 Definitions

- 4.1.2 Safeguarding and promoting the welfare of children means:
- Protecting children from maltreatment
 - Preventing impairment of children’s mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes
- 4.1.3 **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- 4.1.4 **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 4.1.5 **Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Appendix 1 defines neglect in more detail.
- 4.1.6 **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.
- 4.1.7 **Children** includes everyone under the age of 18.
- 4.1.8 The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- The local authority (LA)
 - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
 - The chief officer of police for a police area in the LA area
- 4.1.9 **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 4.1.10 **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what’s appropriate and which terms to use on a case-by-case basis.
- 4.2 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.

- 4.3 We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 4.4 We recognise that it is important for children to receive the right help at the right time to address risks and prevent issues escalating. We understand the importance of acting on and referring the early signs of abuse and neglect, listening to the child, the need for clear records and of reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.
- 4.5 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.6 We recognise that the following groups of children can face additional safeguarding challenges without showing any signs; and communication barriers and difficulties managing or reporting these challenges and of the need to be especially vigilant in recognising the signs of abuse and neglect, bullying in a child who:
- is disabled and has specific additional needs or health conditions;
 - has special educational needs (whether or not they have a statutory education, health and care plan);
 - has experienced discrimination due to their race, ethnicity, religion, gender identification or sexuality;
 - is at risk of FGM, sexual exploitation, and forced marriage
 - 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;
 - is a privately fostered child;
 - is homeless;
 - is an asylum seeker
 - has a parent/carer who has expressed an intention to remove them from school to be home-educated.
- 4.7 The school will support all pupils by:
- 4.7.1 Encouraging self-esteem and self-assertiveness, through the curriculum as well as in our relationships, whilst attempting to counteract aggression and bullying.

- 4.7.2 Having clear policies and procedures to deal with child-on-child abuse including sexting which make clear that abuse is abuse and will not be tolerated. For further detail see section 7 and Annex E and refer to the anti-bullying policy and the IT and e-safety policies.
- 4.7.3 Promoting a caring, safe and positive environment within the school.
- 4.7.4 Aiming at all times to have a child-centred approach which considers the best interests of the child.
- 4.7.5 Liaising and working together with all other support services and those agencies involved in the safeguarding and social care of children.
- 4.7.6 Notifying the child's local authority as soon as there is a cause for significant concern.
- 4.7.7 Where appropriate, checking any concerns which do not appear to meet the threshold or are borderline on an anonymous basis with the child's local authority and following their guidance and recommendations.
- 4.7.8 Providing continued support to school leavers identified as potentially at risk of abuse, by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school and ensuring relevant medical records are forwarded as a matter of priority.
- 4.7.9 Working with the local authority (or the Police as appropriate) where a child may have suffered significant harm, or there may be a criminal prosecution, to consider what support the child or children involved may need.

Confidentiality

- 4.8 We recognise that all matters relating to child protection are confidential subject to overriding legal obligations to disclose information to ensure the safety and well-being of a child. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 4.9 The Headmistress or DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only consistent with legal requirements, and in accordance with the Pan London Child Protection Procedures. The Headmistress or DSL, LADO, Police, and Town Clerk (together with other relevant City Officers) will agree who needs to know about the matter, exactly what information can be shared, how to manage speculation etc., and how to manage any press interest.
- 4.10 All staff are made aware that they have a professional responsibility to share information with other agencies in order to safeguard children. Fears about sharing information must

not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

- 4.11 All staff are made aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 4.12 We will always inform parents/carers of an allegation affecting their child as soon as possible (if they already do not know of it). However, where a strategy meeting is required, the DSL or Headmistress will consult with the LADO (and other relevant agencies such as the Police) beforehand to agree what information can be disclosed to parents so as not to put the child at greater risk of harm, or impede a criminal investigation. Parents/carers will normally be kept informed about the progress of the case and told the outcome where there is no criminal prosecution, including the outcome of any disciplinary process, in confidence.
- 4.13 The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

5. Dealing with Allegations of Abuse Against Staff

- 5.1 Procedures for dealing with allegations of abuse against staff, including supply staff, are carried out in accordance with HM Government Guidance: Keeping Children Safe in Education Part 4 (September 2023), and the Pan London Child Protection Procedures 5th Edition. All staff are made aware of this guidance, the school's procedures, and other local guidance relating to this issue. All relevant contact details are set out on the front page of this policy.
- 5.2 There are two levels of allegation/concern:
- 5.2.1 Allegations that may meet the **harms threshold** should be addressed as below:
- About: Staff, DSL, supply staff, volunteers, contractors should be shared with the Headmistress who informs the Local Authority Designated Officer (LADO)
 - About the Head: should be shared with the Chair of Governors or Safeguarding Governor who inform the LADO (without informing the Head)
 - Where there is a conflict of interest in reporting the matter to the Head the LADO should be informed directly
 - About persons dismissed or removed (or would have been), the DBS should be informed
 - In cases of professional misconduct the TRA should be informed

An allegation that may meet the harms threshold may include, for example:

- a member of staff has behaved in a way that has harmed a child
- possibly committed a criminal offence against a child
- behaved in such a way that indicates they may not be suitable to work with children.

5.2.2 Allegation/concerns that do not meet the harms threshold, hereafter referred to as 'low level concerns'.

5.2.3 If there is any doubt as to whether a concern meets the harm threshold, the School will consult the LADO.

5.2.4 **Low Level Concerns:** In instances of a low-level concern, the concern should be reported to DSL or Senior Deputy who will share the low level concern with the Headmistress. The DSL or Senior Deputy will record it with details of the concern, the context in which it arose, and the action taken. The name of the person reporting will be noted, respecting wishes to remain anonymous as far as reasonably possible. Records will be reviewed on a regular basis so that potential patterns can be identified, and a course of action decided along with any additional staff training. A low-level concern does not mean that it is insignificant, it means that the behaviour towards child does not meet the threshold of an allegation. "A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- humiliating children;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

5.2.4.2 Responding to low-level concerns: If the concern is raised via a third party, the DSL or Senior Deputy will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The DSL or Senior Deputy will use the information collected to categorise the type of behaviour and determine any further action, in line with the Child Protection and Safeguarding Policy. The Headmistress will be the ultimate decision-maker in respect of all low-level concerns, in collaboration with the DSL and/or the Senior Deputy.

When a low-level concern has been raised by a third party, the DSL or Senior Deputy will collect evidence with the person who raised the concern, to the individual involved and any witnesses.

5.2.4.3 Record keeping: All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of behaviour is identified, the school will decide on the best course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.
- Retained at least until the individual leaves employment at the school

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

5.2.4.5 The school will consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

5.2.4.6 The School will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

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

The School will create this culture by:

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

5.3 All school staff should take care to ensure that professional boundaries are maintained so that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (e.g. one-to-one tuition, engaging in inappropriate electronic communication with a pupil, etc.). It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Staff are made aware that special care must be taken in any circumstances where an adult works on a one-to-one basis with a child and in any situation in which it may be necessary for an adult to make physical contact with a child, such as in music instrumental lessons or in sports coaching. See the advice to staff contained in appendices to this document.

5.4 We understand that a pupil may make an allegation against any member of staff. Where there is a conflict of interest in reporting to the Headmistress it will be reported directly to the LADO.

5.5 If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headmistress or, if she is not available, the DSL. The LADO and the Town Clerk (CEO of the City of London Corporation) will be informed within 24 hours of any allegation. The professional advice of the LADO will be of particular importance in these circumstances. The Headmistress on all such occasions will also discuss the allegation with the Chairman of Governors where appropriate. In the absence of the Headmistress the allegation should be passed direct to the Chairman of Governors. The School will not undertake its own investigation before receiving advice from the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations.

5.6 Any allegation against the DSL will be made directly to the Headmistress.

- 5.7 If a professional allegation is made against the Headmistress, the person receiving the allegation will immediately inform the Chairman of Governors who will consult as in 5.5 above, without notifying the Headmistress first.
- 5.8 The purpose of the initial discussion (per 5.5 and 5.7 above) is to consider the nature, content and context of the allegation and to agree a course of action, including whether to obtain any additional relevant information. The DSL should press for reconsideration as necessary. Where this initial sharing of information and evaluation leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, the decision and a justification for it will be recorded by both the Headmistress or DSL and the LADO and agreement reached as to what information should be put in writing to the individual concerned and by whom. The Headmistress or DSL and the LADO will then consider what action will follow in respect of the individual and those who made the initial allegation.
- 5.9 The publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation), will remain confidential. Any such information will only be released if the member of staff is charged with an offence or if the DfE or TRA publish the information.
- 5.10 Any professional allegation will precipitate a strategy meeting, which will involve representatives from the School and other relevant agencies, to decide on the most appropriate action. This is in accordance with the Pan London Child Protection Procedures.
- 5.11 Subject to the approval of the LADO or the Police, where a member of staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. We will follow the City of London's Disciplinary Procedures when managing allegations against staff, a copy of which is readily available in the General Staff Documentation area in the school. Disciplinary action will be considered in conjunction with discussions at the strategy meeting.
- 5.12 We would not normally send a child home, pending such an investigation, unless this advice is given exceptionally as a result of a strategy meeting.
- 5.13 Suspension of the member of staff against whom an allegation has been made needs careful consideration and will not be the default approach adopted. The decision to suspend will be based on information received at the strategy meeting, the information on potential risks to children and whether it compromises any criminal investigation.
- 5.14 In the event of an allegation against the Headmistress, the decision to suspend will be made by the Chairman of Governors with advice as in 5.11 and 5.13 above.

- 5.15 Any allegation of abuse made against a member of staff will be dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.
- 5.16 After every occasion on which a problem arises regarding safeguarding and a member of staff the school will review its procedures in the light of lessons learnt from the case and will amend them as necessary.
- 5.17 Where a child is found to have made a malicious allegation against a member of staff, they will be dealt with in accordance with the school's disciplinary procedures.
- 5.18 Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

6. Dealing with Allegations of Abuse by one or more Pupil/s Against another Pupil (Child-on-Child Abuse) (see also Annex E on Sexual violence and harassment)

- 6.1 The school has a zero-tolerance approach to child-on-child abuse which includes challenging inappropriate behaviours between peers. The school is committed to never downplaying certain behaviours between peers, such as dismissing sexual harassment as "just banter", "having a laugh" or "boys being boys", which can lead to a culture of unacceptable behaviours. This can result in students normalising abuse/harassment and not reporting abuse they witness or experience.
- 6.2 Allegations of abuse of whatever kind, including unpleasant initiation rituals, or attempts to radicalise by one or more pupil against another pupil are taken very seriously. Child-on-child abuse can take many forms, including:
- bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
 - physical abuse such as biting, hitting, kicking or hair pulling, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexually harmful behaviour/sexual abuse such as inappropriate sexual language, touching, sexual assault or rape
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)

- up-skirting – which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is now a criminal offence
- teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

6.3 Disclosures of child-on-child abuse should be handled appropriately. Staff should be able to reassure victims that they are safe, and their disclosures are being taken seriously. Pupils who report abuse should never be made to feel that they are creating a problem, nor should they ever be made to feel ashamed, or victim-blamed for their disclosures.

6.4 If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headmistress and the DSL. For matters that require the attention of the Local Authority Children and Families Team and/or the police, the Headmistress on all such occasions will discuss the content of the allegation with the Town Clerk, any other relevant City Officer, and the Chairman of Governors where appropriate.

6.5 The LADO and the City of London Children and Families Team (children’s social care) will also be promptly informed of any allegation.

6.6 An allegation of abuse will normally be referred to a strategy meeting, involving representatives from the school and the local authority. A strategy meeting also covers any urgent formal strategy discussion which may take place between the police, social care and education managers prior to the first meeting.

6.7 We would not normally send a child home, pending such an investigation, unless this advice is given exceptionally as a result of a strategy meeting.

6.8 Suspension of the pupil, against whom an allegation has been made, needs careful consideration, and the Headmistress will seek the advice from relevant agencies before deciding on the course of action to be taken.

6.9 A bullying incident (as in 10.2 below) will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant

harm. In such cases the matter will be reported to the DSL and to the City of London Children and Families Team (children's social care).

6.10 If there is a disclosure about child-on-child abuse, all children involved, whether perpetrator or victim will be treated as being 'at risk'.

6.11 There is further information about child-on-child sexual violence and abuse in Annex E

7. Supporting Staff

7.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

Where a member of staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. The school will appoint a named representative to keep the individual informed of the progress of the case and consider what other support is appropriate. The investigation will be managed promptly.

8. Whistleblowing

8.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. The school strives therefore to have a culture of safety, raising concerns, valuing staff and reflective practice.

8.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff can also utilise the City's Whistleblowing facilities via the telephone hotline and/or website. Whistleblowing procedures are covered as part of new staff induction training and child protection regular training for existing staff.

8.3 Staff who raise concerns about safeguarding in good faith either with the school's senior management, or with the LADO will not suffer any negative consequences such as notes on their file or denial of promotion.

8.4 Where a member of staff is unhappy about the action taken by the school in relation to a particular concern raised by the staff member, the Headmistress will facilitate a mediation meeting with the staff member and the DSL to explain the school's actions and the reasons for them as far as is possible to maintain a child's confidentiality. If this meeting does not satisfy the member of staff, they should feel able to contact the LADO for more effective action.

- 8.5 If a staff member feels unable to raise an issue with the DSL or LADO and feels that their genuine concerns are not being met, they should use the NSPCC whistleblowing helpline; phone: 0800 028 0285, email: help@nspcc.org.uk.

9. Physical Intervention

- 9.1 The School's policy on physical intervention by staff is set out in the school's policy on Physical Intervention and Restraint and has regard to HM Government's Guidance: 'Use of reasonable force', July 2013. The policy acknowledges that staff have a legal power to use reasonable force i.e. to use no more force than is needed in the circumstances to control or restrain pupils. Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. Physical intervention must be necessary and proportionate to the level of risk and will normally be used as a last resort.
- 9.2 Such an event should be recorded and signed by a witness should there be one. If there was no witness the DSL must be informed immediately.
- 9.3 Staff should avoid touching or restraining a pupil which gives rise to an unacceptable risk of physical harm or in a way that could be interpreted as sexually inappropriate conduct. Physical intervention of a nature which causes injury or distress to a child may need to be considered under child protection or disciplinary procedures.
- 9.4 We understand that force may never be used as a punishment.
- 9.5 All complaints about the use of force should be thoroughly, speedily and appropriately investigated. The school will follow the procedures outlined in paragraph 7.0 should a complaint be received.

10. Equalities and Bullying

- 10.1 The school adheres to the City of London's Equal Opportunities Policy and action will be taken to prevent, and respond to, incidents of inappropriate discrimination, harassment and victimisation, in particular because of differences which arise out of gender or gender reassignment, pregnancy or maternity, special educational need or disability, race, religion or belief, cultural or linguistic background, or sexual orientation. The school acknowledges that repeated incidents or a single serious incident may lead to consideration under child protection procedures.

- 10.2 Our policy on bullying (including racial, religious, cultural, sexual/sexist, homophobic, special educational needs or disability, and cyber bullying) is set out in a separate document (Anti-Bullying Policy). The policy acknowledges that to allow or condone bullying may lead to consideration under child protection procedures, in particular where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the matter will be reported to the DSL and to the LADO.

11. Prevention

- 11.1 We recognise that the School plays a significant part in the prevention of harm to our pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- 11.2 The School community will therefore:
- 11.2.1 Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
 - 11.2.2 Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
 - 11.2.3 Incorporate into the curriculum, the Assembly programme including PSHCEE (Personal, Social, Health, Citizenship and Economic Education), information and opportunities which equip children with the awareness and skills they need to stay safe from harm and to know to whom they should turn for help.
 - 11.2.4 Be proactive about safeguarding by making relationships and sex education and health education an integral part of the school's PSHCEE curriculum.
 - 11.2.5 Make e-safety an integral part of safeguarding by explicitly teaching pupils how to keep safe online in Computer Science lessons working with City of London police, external speakers and through PSHCEE.
 - 11.2.6 Ensure that children are resilient to radicalisation and are prepared to challenge extremist ideology by providing a safe environment for the discussion of sensitive issues, helping children to understand how they can participate in decision-making, and by promoting the spiritual, social, moral and cultural development of all pupils and within this, fundamental British values. Further details are set out in Annex D.
 - 11.2.7 Ensure that no political indoctrination takes place in any of the school curricular or extracurricular activities and that pupils are always exposed to a balanced presentation of political issues.

- 11.2.8 Ensure that all visiting speakers are suitably vetted and supervised to avoid political indoctrination. Details of the procedure to follow are in Annex D to this policy.
- 11.2.9 Ensure that appropriate filtering is in place to prevent children being exposed to inappropriate, illegal or exploitative material, without such measures resulting in over-blocking that would lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- 11.2.10 Ensure that if staff have a mental health concern about a child that is also acknowledged that this is also a safeguarding concern and immediate action should be taken following the procedures in the safeguarding policy and speaking to the DSL. Please refer to the school's Mental Health Policy for further details on procedures and support.

12. Private Fostering

- 12.1 A child who is under the age of 16 (or 18 if they have a disability) living with someone who is not a close relative for more than 28 days is classed as private fostering arrangement.
- 12.2 Children being privately fostered are required by law to be seen by a social worker, and if the School is aware of a private fostering arrangement then we must notify the Children and Families team at the Guildhall.
- 12.3 If the school is aware of someone who is looking after a child - or they plan to be - the Children and Families team must be informed so that they can check that the placement is suitable for the child. You should advise the person that they should contact the Children and Families team before the arrangement begins or within 48 hours of the arrangement being made in an emergency.
- 12.4 As a school we have a legal responsibility to inform the Children and Families Team of any private fostering arrangements that we become aware of.
- 12.5 More information about private fostering and keeping children safe can be found on the City and Hackney Safeguarding Children Partnership website: www.chscb.org.uk.

13. Children Who Go Missing From Education

- 13.1 The school monitors pupils' attendance through a daily register and any unexplained absences are investigated. A child going missing from education is a potential indicator of abuse or neglect.

- 13.2 Unauthorised absences must be reported to the Head of Year and Deputy Head Pastoral immediately and followed up with the parents or guardians.
- 13.3 Staff should be alert to the possible triggers of absence (particularly prolonged or repeated absence) that may be indicative of wider safeguarding concerns. They should watch out for other potential signs of such safeguarding concerns as described in this policy and its annexes and report their concerns immediately to the DSL in accordance with the policy.
- 13.4 The DSL will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.
- 13.5 The DSL will inform their local authority of any pupil who is going to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil registration) (England) Regulations as amended.

This will be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

14. Health & Safety, IT and Related School Policies & Procedures

- 14.1 Our Health, Safety and Wellbeing policy, sets out in a separate document, details the measures being taken by the School to promote the health and safety of all children and staff within the School's environs.
- 15.2 The School recognises the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Our Online Digital and Esafety Policy sets out further details about the measures the School takes in relation to safeguarding children online.
- 15.2.1 To address this, our school aims to:
- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
 - Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
 - Set clear guidelines for the use of mobile phones for the whole school community
 - Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- 15.3 The 4 key categories of risk: Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

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

14.4.1 Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

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

14.4.3 Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety

14.4.4 Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

14.4.5 Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet

- in school, use of the school's ICT systems and use of their mobile and smart technology
- 14.4.6 Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
 - 14.4.7 Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
 - 14.4.8 Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
 - 14.4.9 Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
 - 14.4.10 Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
 - 14.4.11 Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly
- 15.5 Other aspects, such as the procedures for internet use and school trips are set out in this and/or other school policies. For the avoidance of doubt, the School has adequate filtering systems to keep children safe when accessing the internet at school.

ANNEX A

TYPES OF ABUSE AND POSSIBLE SIGNS OF ABUSE

The following information about types of abuse is taken from “Keeping Children Safe in Education” (DFE September 2023).

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

Abuse

“A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those who know them or more rarely by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children. “

Physical Abuse

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

Possible signs of physical abuse are:

Physical Indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing “stockings” or “glove” marks on hands and feet; “doughnut shaped” on buttocks or genital area.
- Rope burns
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Sexual Abuse

“Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see Annex E)“

Possible signs of sexual abuse are:

Physical Indicators:

- Torn, stained or bloody underclothes
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases
- Bruises or bleeding from external genitalia, vaginal or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim’s disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Emotional/Psychological Abuse

“The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or

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

All abuse involves some emotional ill treatment: this category should be used where it is the main or sole form of abuse.

Possible signs of abuse are:

Physical Indicators:

- Eating disorders, including obesity or anorexia.
- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height substantially below norm.
- Flat or bald spots on head (infants)
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults, or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behaviour extremes, such as overly compliant-demanding; withdrawn-aggressive; listless-excitabile.

Neglect

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

Possible signs of abuse are:

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour:
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caretaker at home.

Other Forms of Abuse or Warning Signs

Because of the cultural and social mix at the school, it is important for us to be aware of the growing number of cases in the UK of female genital mutilation, forced marriage and honour-based crimes which have occurred against children and the fact that such forms of abuse could be a safeguarding/child protection issue for some pupils in the School population. See separate annexes on Self-Harming, FGM, Child Sexual Exploitation and Forced Marriage/Honour Based Crimes.

All staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting (youth produced sexual imagery) put children in danger. They should also be aware that safeguarding issues may manifest themselves via child-on-child abuse. This is likely to include, but is not limited to: bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, sexting and initiation rituals. Staff should refer to the anti-bullying policy and Annex E for details on how to deal with child-on-child abuse.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues and should flag any concerns.

Exposure to domestic abuse can have serious, long lasting emotional and psychological impact on children. As with other forms of abuse, staff should be alert to the possibility and report any concerns they have promptly.

Specific safeguarding issues include:

- Child abduction and community safety incidents
- Child and the court system
- Children missing education (CME)
- Children with family members in prison
- Child criminal exploitation (CCE) and child sexual exploitation (CSE)
- County lines and/or gangs
- Modern slavery and the National Referral Mechanism
- Cybercrime
- Domestic Abuse (DA)
- Homelessness
- So called 'honour-based' abuse, including FGM and forced marriage
- Female genital mutilation (FGM)
- Forced marriage
- Preventing radicalisation
- The Prevent duty
- Child-on-child abuse
- Sexual violence and sexual harassment between children

ANNEX B

AWARENESS OF FEMALE GENITAL MUTILATION (FGM), CHILD SEXUAL EXPLOITATION (CSE), FORCED MARRIAGE (FM) AND HONOUR BASED ABUSE

FEMALE GENITAL MUTILATION (FGM)

The following general statement about schools' responsibilities in relation to FGM is taken from "Keeping Children Safe in Education" (DfE 2023).

Female Genital Mutilation (FGM): practitioners in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Practitioners should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and City of London Children and Families Team (children's social care)."

Warning Signs relating to FGM

The multi-agency practice guidelines identify a number of warning signs that a student may be at risk of undergoing FGM or may have already undergone it. These include:

- Practitioners overhearing students talking about FGM
- Disclosure by a student or one of her friends
- A child going abroad to a country where FGM is known to be prevalent for an extended period
- A child who presents with medical difficulties such as frequent urinary infections or severe menstrual problems
- Prolonged unexplained absence from school
- Behavioural changes such as withdrawal or depression
- Reluctance to agree to routine medical examination

Implications for the school

- All adults who work with girls and young women must be alert to the risk of FGM.

- A number of students at the school belong to communities in which FGM has traditionally been practised and have close family links with countries abroad where it is prevalent and so are potentially at risk.
- Teachers have an obligatory duty to report to the police when they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out in a girl under 18. Those failing to report such cases face disciplinary action. Teachers should still consider and discuss such cases with the DSL and involve City of London Children and Families Team (children's social care) as appropriate.

In addition to being vigilant and aware of the possibility of FGM affecting our students, the school will take proactive measures to raise students' awareness of the issue and to foster an atmosphere in which students will be able to voice concerns, by including FGM in PSHCEE and elsewhere in the curriculum where appropriate.

CHILD SEXUAL EXPLOITATION

All children, whatever their backgrounds, can be at risk of CSE so staff at the school need to be aware of its possibility.

What is child sexual exploitation?

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to children in gangs.

POSSIBLE SIGNS OF CSE

- inappropriate sexual or sexualised behaviour
- repeat sexually transmitted infections; in girls repeat pregnancy, abortions, miscarriage
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- going to hotels or other unusual locations to meet friends
- getting in/out of different cars driven by unknown adults
- going missing from home or care
- having older boyfriends or girlfriends
- associating with other children involved in sexual exploitation
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)

- drug or alcohol misuse
- getting involved in crime
- injuries from physical assault, physical restraint, sexual assault

This is not an exhaustive list and indicators can change over time.

FORCED MARRIAGE (FM)

Some students at the school may be at risk of forced marriage or be related to people who are at risk of forced marriage, so it is important for staff to be aware of its existence.

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

Warning signs of forced marriage to look out for:

- Depression and self-harming behaviour such as anorexia, cutting, substance misuse or attempted suicide.
- They may ask school nurses for vaccinations for an upcoming "family holiday" or about contraception.
- Victims who have already been forced into marriage may have injuries consistent with rape or domestic violence and may ask about termination of a pregnancy.

All school staff should be aware that children at risk are often strictly monitored by their parents. They may not be able to attend after-school activities or be allowed to talk to the opposite sex. They may be monitored by siblings while at school. They may not be allowed to consider going to university or getting a job after leaving school or college.

They may be about to travel on a planned "family holiday" or moving overseas which may be a cover story for a forced marriage. If these factors are present, the young person may be at risk of forced marriage and you should contact the DSL immediately

For information about forced marriage and relevant legislation see:

<https://www.gov.uk/forced-marriage>

HONOUR BASED ABUSE

There is no specific offence of "honour-based crime". It is an umbrella term to encompass various offences covered by existing legislation. Honour based abuse can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

It is a violation of human rights and may be a form of domestic and/or sexual violence. There is no, and cannot be, honour or justification for abusing the human rights of others.

The Crown Prosecution Service, the Association of Chief Police Officers and support groups have a common definition of HBV:

"'Honour based violence' is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community."

Some students at the school could be at risk of Honour Based Abuse

ANNEX C

STAFF CODE OF CONDUCT

INTRODUCTION

All staff accept responsibility for the welfare of children with whom they come into contact in the course of their work, and will report any concerns about a child or somebody else's behaviour, using the procedures laid down in the school's Child Protection Policy. Staff must have due regard to the Prevent duty both as part of their safeguarding responsibilities and as part of their professional conduct as stipulated by the Teachers' Standards Part 2.

Susannah Gilham, Elly Nicoll and Justine Venditti are the Designated Safeguarding Leads in the school who will take action following any expression of concern in accordance with the process laid out in the school's safeguarding and child protection policies.

The Headmistress and the school's Designated Safeguarding Leads know how to make appropriate referrals to statutory child protection agencies. Laura Demetriades is the City of London's Children and Families Service Manager (LADO) and should be consulted for all safeguarding matters via the DSL if the matter pertains to a City of London resident child, or an issue relating to potential / actual allegations against staff, and for advice on liaising with another LA in respect of safeguarding issues. When appropriate, the school will consult with the School's HR department for advice and technical support concerning the process in relation to allegations made against staff.

All staff who come into contact with children in the course of their professional activities must adhere to the school's Child Protection Policy, the procedure for reporting safeguarding concerns and have regard to any other relevant guidance issued by the school. Failure to comply with these obligations may result in disciplinary action in accordance with the school's Disciplinary Procedure. Staff are also expected to observe the Teachers' Standards issued by the DfE at all times.

Information relating to any allegation or disclosure must be clearly recorded as soon as possible, as outlined in the Child Protection Policy and supporting documents.

The Children Act 1989 states that the 'welfare of the child is paramount'. This means that considerations of confidentiality which might apply to other situations should not be allowed to over-ride the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all concerned when an allegation has been made and is being investigated.

The Child Protection Policy will be referred to or included in recruitment, training and policy materials, where appropriate, and the policy will be openly and widely made available to members and staff and volunteers and actively promoted within the organisation.

A culture of mutual respect between children and staff will be encouraged, with adults modelling good practice and professional behaviour at all times in line with the Teachers' Standards.

It is part of the school's acceptance of its responsibility of duty of care towards children that members of staff who encounter child protection concerns in the context of their work will be supported when they report their concerns in good faith. Staff must also be aware of the procedures for whistleblowing as detailed in the Child Protection policy and the City of London Corporation whistleblowing procedures.

STAFF AND VOLUNTEERS MUST AVOID:

- Inappropriate physical contact with children: Physical contact is only appropriate in very limited circumstances. For more detailed advice, see the school's policy on Physical Contact and Restraint. Staff will be shown the location of this policy and all other school policies as part of their induction training as well as given copies of policies as stated in 2.1.10.
- Taking the lead from children in their behaviour or engaging in any behaviour that may be seen as in breach of the Teachers' Standards, be perceived as unprofessional, may bring the school into disrepute or may be misrepresented.
- Using confidential or sensitive information about a child or their family for their own benefit or to humiliate or embarrass a child. Confidential information about pupils or the School should not be shared casually however; information that might suggest that a child is in need or at risk of significant harm must be shared with the DSL, in accordance with the safeguarding / child protection procedures.
- Taking photos of children: photographs and films taken for official school use may be covered by the Data Protection Act, e.g. if the images are going to be stored with other personal data. If the photograph is taken of groups of pupils during lessons and will be used in the school prospectus, then the Data Protection Act does not apply. Names of children must not be published with photographs or films.
- Establishing or seeking to establish any social contact with a pupil or their parents/carers. Unplanned or other social contact that happens outside of the school setting should be reported to the Headmistress. Staff should not give their personal telephone numbers or email addresses to pupils or their parents. No member of staff will enter into extra or private tuition or childcare arrangements with parents without the permission of the Headmistress. Staff should notify their line manager of any existing or previous family or social relationship with a pupil or their parents/carers.
- Making suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted. Inappropriate remarks include innuendo, swearing, and discussing their or your own intimate relationships.
- Other than for routine classwork related matters, communicating directly with children by email or text messages and only then with the prior consent of the child's parent or guardian. If electronic communication is necessary, best practice would be to communicate directly with parents or guardians and to copy in a senior colleague. Further guidance on electronic communications with pupils is to be found later in this annex of the Child Protection Policy.
- Communicating with children via Twitter, Facebook or other social media.

- Engaging in behaviour which could be construed as ‘grooming’ a child (for example giving a child money, presents or favours or talking or behaving in an inappropriate or unprofessional manner towards children).
- Communicating to the public, press, television or any outside agency the contents of any documents relating to the school/Corporation or the proceedings of any safeguarding matters that is confidential information unless required by law or authorised by an appropriate official to do so.
- Making personal use of telephones, e-mail and internet facilities during work time. They may only use them at the Headmistress’s discretion, or when there is an urgent need to contact someone in an emergency. The time spent should be kept to a minimum. Staff should also inform their family and friends only to contact them at work when it is necessary.
- It is not unusual for pupils or, sometimes, their parents to develop infatuations or “crushes” on staff. Staff must not keep this a secret. All such situations must be responded to sensitively to maintain the dignity of those concerned and any indications that this might be happening reported to the Headmistress. In addition, the object of the pupil or parent’s affections may not even be aware of this. In this case colleagues must bring this to the colleague’s attention and report to the Headmistress.
- It is not permissible to take children alone in a car on journeys, however short, unless with the prior consent of the child’s parent or guardian, and then only in exceptional circumstances with prior authorisation from the Headmistress.

STAFF AND VOLUNTEERS MUST:

- Maintain an attitude of ‘it could happen here’ where safeguarding is concerned.
- Dress appropriately whilst at work so that confidence of pupils, parents and the general public is maintained. Whilst the school values diversity and are not seeking to achieve a complete uniformity of dress style, the school does expect all employees’ clothing at work to be neat, clean, modest and appropriate.
- Take a disclosure of abuse from a child seriously. It is important not to deter children from making a disclosure of abuse through fear of not being believed, and to listen to what they have to say. Guidance on responding to an allegation of abuse is set out in section 4 of the Child Protection Policy. If the allegation gives rise to a child protection concern it is important to follow the school’s procedure for reporting such concerns, and not to attempt to investigate the concern yourself.
- Always report any concerns, however small, immediately to the school’s Designated Safeguarding Lead in a non-judgemental manner regarding the conduct of another staff member in relation to children.
- Remember that those who abuse children can be of any age (even other children), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.
- Value and respect children as individuals, and model adult appropriate conduct - which will always exclude bullying, shouting, racism, sectarianism or sexism.
- Obtain written permission from pupils and their parents/carers before taking photographs or films. All images and films must be stored appropriately and securely only used by those

authorised to do so staff should be able to give account of the rationale behind any images of pupils that are in their possession.

- Always follow the advice and guidance on child protection and safeguarding issues available via the relevant annexes of the school's Child Protection Policy which can be found on the school's website.
- Report any child who falls sick on a school trip to the DSL on return to school

GUIDANCE ON RESPONDING TO A CHILD MAKING AN ALLEGATION OF ABUSE:

- Stay calm.
- Listen carefully to what is said and show that you are taking it seriously.
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Tell the child that the matter will only be disclosed to those who need to know about it.
- Allow the child to continue at her/his own pace.
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
- Reassure the child that they have done the right thing in telling you.
- Tell them what you will do next, and with whom the information will be shared (in school it will need to be a Designated Safeguarding Lead).
- Make no judgement about what you have heard.
- Record in writing what was said, using the child's own words as closely as possible, and as soon as possible - note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.
- Remember that whilst you may have been the first person encountering an allegation of abuse it is not your responsibility to decide whether abuse has occurred. That is a task for the professional child protection agencies, following a referral from the Designated Safeguarding Lead from the school.

GUIDANCE ON AVOIDING BEHAVIOUR WHICH COULD BE MISINTERPRETED

All adults who work with children are at risk from false accusations of abuse or inappropriate behaviour. This is particularly true in the current climate of increasing parental empowerment and litigiousness and when reporting of abuse in the media is frequent. All staff are advised to exercise common-sense and caution to ensure as far as possible that their behaviour is never open to misinterpretation. This is especially true of male staff working in a girls' school, but it is also applicable to female staff.

Much of the advice included in the child protection policy is simply sound common sense and is routinely followed by all teachers. It is related to the maintenance of the appropriate boundaries, which are intrinsic to our profession. The culture of this school is intended to be supportive of the students and traditionally relations between Staff and pupils here are friendly. Nobody would wish for these positive aspects of school life to be replaced by excessive formality, or for there to be a

climate of suspicion and distrust, but it is essential that a proper distance is maintained between teachers and students.

The following points should be borne in mind:

- Avoid being alone with a pupil unless it is really necessary or inevitable.
- If you are alone with a pupil, ensure that what passes is clearly visible from outside the room. Most rooms at the school have glass panels in the door, but it is still advisable to consider whether the door can practically be left open.
- Where there is no glass panel in the door, it is definitely advisable to make sure that the door is open.
- Except when absolutely necessary, for example when assisting a child in PE or when teaching a musical instrument, avoid all physical contact with pupils. If you do need to touch a child, explain in advance that you are going to do so, and why.
- It is certainly necessary to avoid any physical contact when you are alone with a pupil. Sadly, even a consoling hug can be misinterpreted or misrepresented.
- Take care over commenting on a child's appearance. A casual remark can also be misinterpreted or misrepresented.
- Ensure that any supervision in changing rooms is respectful to the child.

GUIDANCE ON TEACHER/PUPIL BOUNDARIES

- It is important to ensure that the school retains its friendly and open atmosphere and that a climate of unwarranted suspicion does not develop.
- Sadly, some children on some occasions either misinterpret or even maliciously misrepresent the behaviour of adults. This is very rare in schools of this type but it has happened and so it is very important to observe appropriate professional boundaries and to avoid putting oneself in a vulnerable position.
- Adolescents can develop "crushes" on their teachers. All teachers need to be aware of this possibility and to seek advice from senior colleagues if they feel that they are being inappropriately focused on by a pupil.
- In addition to exercising caution when seeing pupils there may well be occasions on which it is better to have another colleague with you when you see an individual student, just as at times it is more appropriate not to see parents on one's own.
- Contact between teaching staff and pupils (including recent ex-pupils) outside school in contexts other than on organised school activities is only very rarely likely to be appropriate. Colleagues should always consult senior staff about any possible contact of this kind and should always ensure that it is known about and approved of by the child's parents.
- If you are asked to give a child extra tuition or a private lesson in their own home, you should consult your Head of Department before agreeing and the Head of Department will liaise with the Headmistress or Senior Deputy Head about the proposed arrangements.
- Inviting a pupil to your own home for extra teaching or any other purpose is fraught with difficulty and is to be avoided.
- It is important to be especially cautious at social occasions at which staff and students are both present. It may be tempting to step out of role at events such as the leavers' ball, but

it must be emphasised that pupils remain under our care and on the school roll until the end of the summer holidays after they have left school.

- Even if they are over 18 and are about to leave school, students continue to be “vulnerable people” in terms of safeguarding legislation whether or not they are legally adult and teachers retain their professional obligations towards them. In any case, many of them have younger sisters or friends who will remain in the school and who will gossip about perceived indiscretions in the next school year.
- Staff should never give alcoholic drink to students and should avoid situations in which their presence could be interpreted as permitting or encouraging students to drink.
- Do not be afraid to ask for advice from or to express concern to the DSL or other senior members of staff.

GUIDANCE ON ONLINE BEHAVIOUR AND USE OF ELECTRONIC MEDIA

Staff must follow the City of London Corporation’s Social Media policy and Code of Conduct for Teachers. The following points give general guidance:

- Be extremely careful over the use of Facebook, Instagram, YouTube and any other social media.
- Make sure your privacy settings on social networking sites are at the highest possible level to avoid IT savvy pupils being able to access any private material.
- Never accept a student, parent or a recent leaver as a “friend” on any social media
- If you need students, parents or recent former pupils to contact you via Facebook, Twitter or the like for a school related activity (e.g. for a team or trip), set up a special separate site and let the DSL and Director of ICT know what you have arranged and why.
- Always use your school e mail address and students’ school email addresses when communicating with pupils by email.
- For anything apart from the most routine delivery and return of work or any learning-related queries, copy in your HOD or another appropriate colleague to all e mail exchanges with students and parents.
- Use a school mobile phone rather than your private phone for school activities and contacting students and parents. If enough warning is given these can be borrowed from the school.
- Only contact a student on her mobile phone or keep her number on record if there is a real need to do so and make sure that you inform your HOD or another appropriate colleague about why you are doing so.

Apply common sense and professional judgement in all your electronic contacts with students and parents.

ANNEX D

THE PREVENT DUTY

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies (“specified authorities” listed in Schedule 6 to the Act), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. From 1st July 2015, all schools and registered childcare providers are subject to this duty and must have regard to the statutory guidance.

The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

Two important concepts in Prevent are “extremism” and “radicalisation”. It is argued that terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them. The government has defined extremism in the Prevent strategy as: “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces”.

WHAT DOES THE PREVENT DUTY MEAN FOR SCHOOLS?

In order to fulfil the Prevent duty, schools must be able to identify children who may be at risk of radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of the wider safeguarding responsibilities of schools and it is similar in nature to protecting children from other harms, whether these come from within their families or are the product of outside influences. This appendix therefore must be read in conjunction with the Safeguarding and Child Protection policy.

Schools must also build resilience to radicalisation by promoting fundamental British values and enabling pupils to challenge extremist ideologies. Complying with the Prevent duty should not stop schools debating controversial issues. On the contrary, schools should provide a safe space where pupils can develop an understanding of the risks associated with terrorism and develop the knowledge and skills to challenge extremist arguments.

There are four general duties placed on schools:

- 1) Risk assessments

Schools are expected to assess the risk of their pupils being drawn into terrorism, including support of extremist ideas that are part of a terrorist ideology, based on a general understanding of the risks affecting children in their area and a specific understanding of how to identify individual children at risk and offer support.

2) Working in partnership

Schools are expected to continue to work with Local Safeguarding Children and Community Safety Partnerships and local Prevent Leads.

3) Staff training

Schools are expected to provide Prevent awareness training to help staff identify children at risk of radicalisation and to challenge extremist ideology.

4) IT policies

Schools are expected to have suitable levels of filtering to prevent access to material that promotes terrorism and extremist ideologies. Compliance with the Prevent duty falls within school's responsibility to teach e-safety.

HOW THE PREVENT DUTIES ARE DISCHARGED AT CITY OF LONDON SCHOOL FOR GIRLS?

Risk Assessments

A significant proportion of the school's pupils come from London Boroughs which are a Prevent priority 1 or 2, which means that the risk of them being drawn into terrorism is potentially significant. However, only a small proportion of pupils are Muslim. While this does not mean that non-Muslim pupils are not a potential target, they are less likely to be exposed to such a possibility. It is however possible that they may be drawn into a different type of extremism such as far right or far left.

Therefore, the risk of radicalisation at the school is potentially high for a small number of pupils and less high for the vast majority.

The risk to individual pupils is monitored through our pastoral structure and in particular the tutors, who take into account all the factors and patterns of behaviour detailed in section 4. Attendance monitoring plays an important part in assessing vulnerability.

We remain alert to the possibility of staff becoming radicalised and watch out for signs of this (e.g. reports from members of the school community). All speakers are vetted to check they are not a risk.

This risk will be reviewed annually as part of our annual Safeguarding review.

Working in Partnership

The school works closely with the City and Hackney Safeguarding Children Partnership and with the Community Safety team and its Prevent Coordinator at the City of London Corporation.

Staff Training

As part of the annual INSET on safeguarding, staff receive appropriate training on relevant aspects of the Prevent Duty, including how to identify children at risk of being drawn into terrorism, how to challenge extremist ideologies and what to do if staff become concerned about a child being drawn into terrorism.

WRAP training (workshop on raising awareness of Prevent) has been completed by at least the DSL and the DDSL (Prevent Lead). The DDSL (Prevent Lead) is the first source of advice for staff on all matters related to the Prevent Duty.

IT Filter

The school has a strict and effective filtering and e-safety is delivered through both Computer Science and PSHCEE lessons. There is also an e-safety coordinator who is responsible for all matters of e-safety and keeps a log of incidents and reports annually to the governors. The Deputy Head Pastoral has responsibility for the issuing of sanctions to pupils.

In addition, to fulfil its Prevent duty, the school undertakes to:

- 1) Maintain and review annually robust safeguarding policies which take in to account the policies and procedures set out by City and Hackney Safeguarding Children Partnership and incorporate due regard to the Prevent Duty.
- 2) Conduct due diligence checks on staff, groups or individuals seeking to hire or use school premises, on visitors to school, particularly visiting speakers, whether invited by children or staff and on contractors working on the school site.
- 3) Actively promote fundamental British values as part of the school's wider SMSC/PSHCEE programmes as well as within other subject areas and assemblies.
- 4) Ensure that no political indoctrination takes place in any of the school curricular or extracurricular activities and that pupils are always exposed to a balanced presentation of political issues.
- 5) Ensure that children are resilient to radicalisation and are prepared to challenge extremist ideology by providing a safe environment for the discussion of sensitive issues, helping children to understand how they can participate in decision-making.

DDSL (Prevent Lead) Responsibilities

One of the DDSL is the nominated Prevent Lead at the school and has responsibilities for the oversight of the discharge of the Prevent Duty at school. Details on the DDSL are in the appendix to the Safeguarding and Child Protection Policy and their responsibilities are as follows:

- 1) To be the first point of contact for parents, pupils, teaching and non-teaching staff and outside agencies in matters relating to Prevent.
- 2) To coordinate the Prevent Duty procedures in the school.

- 3) To undergo appropriate training (including WRAP).
- 4) To maintain an ongoing training programme on Prevent related issues for all staff.
- 5) To liaise with the local Prevent coordinator, the police, local authorities and other agencies.
- 6) To keep appropriate records of Prevent related incidents.

PROCEDURES OF VETTING VISITING SPEAKERS

The Prevent statutory guidance requires the school to have clear protocols for ensuring that all visiting speakers are suitable and appropriately supervised. This applies whether the speakers are booked by pupils or staff.

Where speakers are booked by pupils there must be a sponsoring member of staff who will oversee the event and should complete the form. In all cases, a visiting speaker risk assessment form must be completed in advance of the person coming to speak at the school.

This form is accessed and submitted via a link from the school's portal to the Deputy Head Partnerships and Co-curricular's office, or in the case of PSHCEE speakers to the Deputy Head Pastoral. This must be no fewer than 72 hours before the event. Further checks on the speaker will then be undertaken where necessary.

The relevant Deputy Head may decide to cancel or postpone an event if she has any concerns about the speaker. Records of all visiting speakers will be retained by the school in accordance with the data retention policy and until the end of the academic year of their visit.

Visiting speakers will be asked to bring their passport or photo ID and proof of home address with them on the day of their visit. Visiting speakers are not safeguarding checked. They will be issued with red lanyards and must be supervised whilst in school.

HOW TO SPOT A CHILD VULNERABLE TO RADICALISATION: VULNERABILITY ASSESSMENT

"There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a "profile" can be misleading." (Channel Guidance)

The Channel Vulnerability Assessment Framework (February 2021, Annex C) suggest indicators. The framework involves three dimensions: engagement, intent and capability.

Engagement with a group, cause or ideology ("psychological hooks")

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination

- A desire for political or moral change
- Opportunistic involvement
- Family or friends' involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues.

Intent to cause harm or readiness to use violence

- Over-identification with a group or ideology
- 'Them and Us' thinking
- Dehumanisation of the enemy
- Attitudes that justify offending
- Harmful means to an end
- Harmful objectives

Capability to cause harm

- Individual knowledge, skills and competencies
- Access to networks, funding or equipment
- Criminal Capability

Some pupils will be more vulnerable to be influenced by others because of the existence of one or more factors, which may include:

- An identity crisis, involving an individual's distance from their cultural/ religious heritage, including peer/ family/ faith group rejection
- A personal crisis, including family tension/ social isolation/ friendship issues
- Personal circumstances, such as migration, experience of racism
- Unmet aspirations
- Criminality
- Experience of poverty, disadvantage, discrimination or social exclusion

The following are further risk indicators:

- Racist graffiti/ symbols/ comments made in School
- Speaking out or writing in favour of extremist ideas in school work
- Extreme comments shared on social media
- Erratic attendance patterns, including travel for extended periods of time to international locations known to be associated with extremism
- Distribution of extreme or terrorist propaganda among other pupils
- Association with those known to be involved in extremism (including via the internet)
- A significant shift in the child/ young person's behaviour or outward appearance, particularly involving conflict with his/her family and/or faith group

- A simplistic or flawed understanding of religious/ political/ global issues
- A significant adult or other in the child/ young person's life who has extremist views or sympathies

Critical risk factors include:

- Contact with extremist recruiters
- Articulation of support for extremist causes/ leaders
- The possession of extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Membership of extremist organisations

All staff and in particular pastoral staff need to be alert to the signs described above in their interactions with pupils. Monitoring of attendance by tutors and Heads of Year is a crucial part of detecting potential radicalisation.

CHALLENGING EXTREMIST IDEOLOGIES

"All terrorist groups have an ideology. Promoting that ideology, often through the internet, facilitates radicalisation and recruitment. Challenging ideology and disrupting the ability of terrorists to promote it is a fundamental part of Prevent.

In addressing ideological issues, we also need to be very clear about our purpose and method. The great majority of people in this country find terrorism repugnant and will never support it. Work to challenge ideology should not try to change majority opinion because it does not need changing. Our purpose is to reach the much smaller number of people who are vulnerable." (Prevent Guidance)

The school ensures that no political indoctrination takes place at school and that pupils are always exposed to a balanced presentation of political views both in lessons, and in extracurricular activities. The school has a vetting procedure for visiting speakers and has due regard to the Prevent duty in its lettings policy.

The school also builds resilience to radicalisation by providing a broad and balanced curriculum that promotes the spiritual, social, moral and cultural development of pupils and within this, fundamental British values and by providing a safe environment where pupils can discuss sensitive issues and learn how to participate in decision making. Pupils will be taught in PSHCE information and skills to keep safe from harm of all types and who to turn to for help. In addition, the PSHCE curriculum will continue to challenge students to be critical of media, including social media and provide key counter-narratives to extremist ideology, through resources such as the Community Response to Extremism DVD, London Grid for Learning and Inspire.

The school will continue to encourage learning through diversity by promoting the objectives of the Equalities Act 2010.

The Religion, Philosophy and Ethics department at the school can help challenge extremist ideologies by including lessons at KS3 and KS4 on the difference between Islam and Islamic Extremism, building on the schemes of work that are already in place. It will also continue to challenge any "Islamophobia" feelings by giving a balanced and objective overview of the main precepts of all the major religions.

Promoting critical thinking skills across all subjects remains central to challenging any form of extremism.

If staff encounter expressions of extremist ideology in their lessons, they should challenge the views and correct any factual misconceptions; however, it is very important that this is done in a non-judgmental way that encourages further dialogue. Therefore, it is advisable to engage the student with open questions, using conditional rather than absolute language. This can either be done during the class discussion or on a one-to-one basis after the lesson has finished.

WHAT TO DO WHERE THERE ARE CONCERNS ABOUT A PUPIL

Concerns about a child being vulnerable to radicalisation and extremism should be reported promptly following the usual procedures as detailed in the Safeguarding and Child Protection policy. Staff should bring their concerns to the attention of the DSL or the DDSL (Prevent lead) in the first instance but are also entitled to contact the LADO or the Prevent Coordinator at the Community Safety Team of the City of London directly. Details of how to contact the LADO and the Prevent Coordinator are in the Safeguarding and Child protection policy appendix.

Records will be kept by the DDSL of all concerns and she will liaise with outside agencies as appropriate in line with the Safeguarding and Child Protection Policy.

For children perceived to be at immediate risk of harm, the LADO will be contacted immediately. For children who show early signs of being vulnerable to radicalisation and who need further support, the school will make a Channel panel referral, in consultation with the LADO and the Prevent Coordinator in the Community Safety Team.

If a child is suspected or identified as already engaged in illegal terrorist related activity, they will be reported to the police. The following are useful contact numbers; Anti-Terrorist Hotline: 0800 789 321, Crime stoppers: 0800 555 111, Relevant Police force: 101.

Staff and governors may also use the DfE dedicated helpline and mailbox for non-emergency advice: 0207 340 7264 and counter-extremism@education.gsi.gov.uk

ANNEX E

CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also involve a wider group. Children who are victims of sexual violence or harassment will likely find the experience stressful and distressing and it can adversely affect their educational attainment. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. Children with SEND are disproportionately likely to be victims of sexual violence or harassment. Children who are perceived to be lesbian, gay, bi or trans (LGBTQ+) can be targeted by their peers, even if such an attribution is wrong. It is recognised that national statistics suggest that it is more likely that girls will be victims and boys perpetrators.

Sexual harassment can be defined as ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to violate a child’s dignity and/or make them feel intimidated, degraded or humiliated.

Sexual harassment can include:

- Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about appearance and calling someone sexualised names;
- Sexual “jokes” or taunting
- Displaying pictures of a sexual nature
- Online sexual harassment which might include non-consensual sharing of images, bullying and sexual exploitation, coercion and threats.
- “Up-skirting”, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.

Problematic, abusive and violent sexual behaviour may cause developmental damage. Harmful sexual behaviour can occur online and/or offline.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma and it is important that they are offered appropriate support and education.

The PHSCEE programme offers an age-appropriate curriculum educating pupils about what constitutes a healthy relationship and the nature of consent. In addition, all staff should challenge any homophobic teasing or other inappropriate sexual discussion.

RESPONDING TO INCIDENTS OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT.

In this school, incidents of violence are rare and sexual violence has not been a problem, however, we remain alert to the possibility that this could occur. It is more likely that we would have to support a victim of sexual violence who had been abused by a pupil at another school. In cases of

sexual violence, action would be taken in line with the procedures set out in the rest of this policy, referring the case to children's social care and the police if a crime has been committed. Where the abuse involved online illegal images of children, these will not be viewed or forwarded unless absolutely unavoidable and in these cases two members of staff should be involved in the decision.

Sexual harassment is a more likely scenario. If the threshold for early help or statutory intervention is not reached, the management of these cases will follow the Anti bullying policy. The school response will be underpinned by the principle that sexual violence and harassment is never acceptable and will not be tolerated. All concerns and discussions and decisions will be recorded.

Consideration must be given to the wishes of the victim who may ask that no one else is told. However, the DSL may judge that it is in the best interests of the child to inform others either to protect the victim or safeguard others. As a rule, parents should normally be informed unless to do so would put the victim at greater risk.

Depending on the seriousness of the allegation, consideration should be given to ensuring the victim and the perpetrator are not in the same classes at least until the issue has been investigated and action taken.

The needs and wishes of the victim should be paramount so they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine so school is a safe place for them.

If it is clear that ongoing support will be required, the victim should be asked to name a trusted adult whom they can talk to about their needs.

Consideration also needs to be given to the needs of the perpetrator. Although it is highly likely that sanctions will be both justified and deserved, it might be helpful to involve the school counsellors or external professionals to understand why they have acted in this way. Sanctions should be balanced with a consideration of the broader picture and should be decided on a case-by-case basis. Parents of the perpetrator would normally be informed about what has happened, but this would depend on the specific circumstances.

Action may also need to be taken to minimise reports spreading more widely and to avoid other children 'taking sides'. Social media is likely to play a central role and how to prevent or minimise the impact of this should be considered.

CONFIDENTIALITY

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

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

SHARING NUDES AND SEMI-NUDES: HOW TO RESPOND TO AN INCIDENT: ADVICE FOR EDUCATION SETTINGS WORKING WITH CHILDREN AND YOUNG PEOPLE (DECEMBER 2020)

In December 2020 the UK Council for Child Internet Safety (UKCCIS) published non-statutory guidance on managing incidents of the sending or posting of nude or semi-nude images by young people under the age of 18. The UKCCIS guidance is non-statutory but should be read alongside Keeping Children Safe in Education.

Sharing nudes and semi-nudes is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

If an incident comes to your attention:

- **Report it** to your DSL or equivalent immediately
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal [In exceptional circumstances, it may be necessary for the DSL (or

equivalent) only to view the image in order to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent)]

- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent)
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or their, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

ANNEX F

CRIMINAL EXPLOITATION OF CHILDREN

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

County lines exploitation can affect any child under the age of 18 years. It can still be exploitation even if the activity appears consensual, can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. County lines exploitation can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance such as age, gender, cognitive ability, physical strength, status, and access to economic or other resources.

SERIOUS VIOLENCE

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

ANNEX G

PROCEDURE FOR DEALING WITH SELF-HARM

Recent research indicates that up to one in ten children in the UK engage in self-harming behaviours. Schools can play an important role in preventing self-harm and also in supporting students, peers and parents of students currently engaging in self-harm.

Scope

This document describes the school's approach to self-harm. This document is intended as guidance for all staff including teachers and support staff.

Aims

- To increase understanding and awareness of self-harm
- To alert staff to warning signs and risk factors
- To provide support to staff dealing with students who self-harm
- To provide support to students who self-harm and their peers and parents/carers

Definition of Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body
- Scouring or scrubbing the body excessively

Risk Factors

The following risk factors, particularly in combination, may make a young person particularly vulnerable to self-harm:

Individual Factors:

- Depression / anxiety
- Poor communication skills
- Low self-esteem
- Poor problem-solving skills
- Hopelessness
- Impulsivity
- Drug or alcohol abuse

Family Factors:

- Unreasonable expectations
- Neglect or physical, sexual or emotional abuse
- Poor parental relationships and arguments
- Depression, self-harm or suicide in the family

Social Factors:

- Difficulty in making relationships / loneliness
- Being bullied or rejected by peers

Warning Signs

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should always be taken seriously and staff observing any of these warning signs should seek further advice from the Designated Safeguarding Lead (DSL) for safeguarding children - Deputy Head Pastoral Susannah Gilham, or in her absence Justine Venditti, the Senior Deputy Head, or in her absence, Elly Nicoll, Head of Lower School.

Possible warning signs include:

- Changes in eating / sleeping habits (e.g. student may appear overly tired if not sleeping well)
- Increased isolation from friends, becoming socially withdrawn
- Changes in activity and mood e.g. more aggressive or introverted than usual
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing

Staff roles in working with students who self-harm

Students may choose to confide in a member of school staff if they are concerned about their own welfare, or that of a peer. School staff may experience a range of feelings in response to self-harm in a student such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to students it is important to try and maintain a supportive and open attitude – a student who has chosen to discuss their concerns with a member of school staff is showing a considerable amount of courage and trust.

Students need to be made aware that it may not be possible for staff to offer complete confidentiality. If you consider a student is at serious risk of harming themselves then confidentiality cannot be kept. It is important not to make promises of confidentiality that cannot be kept even if a student puts pressure on you to do so.

Any member of staff who is aware of a student engaging in or suspected to be at risk of engaging in self-harm should consult the DSL or DDSLs straight away.

Following the report, the designated teacher will decide on the appropriate course of action. This may include:

- Contacting parents /carers
- Arranging professional assistance e.g. from the GP, A&E, social services etc
- Arranging an appointment with a counsellor
- Immediately removing the student from lessons if their remaining in class is likely to cause further distress to themselves or their peers
- In the case of an acutely distressed student, the immediate safety of the student is paramount and an adult should remain with the student at all times
- If a student has self-harmed in school the school nurse or a first aider should be called for immediate help
- Possible adjustments in school include: risk assessment, Time Out card, reduced timetable, SEND support etc.

Further Considerations

Any meetings with a student, their parents or their peers regarding self-harm should be recorded in writing including:

- Dates and times
- An action plan
- Concerns raised
- Details of anyone else who has been informed

This information should be stored in the confidential child protection file.

It is important to encourage students to let you know if one of their group is in trouble, upset or showing signs of self-harming. Friends can worry about betraying confidences so they need to know that self-harm can be very dangerous and that by seeking help and advice for a friend they are taking responsible action and being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult the designated teacher for safeguarding children. When a young person is self-harming it is important to be vigilant in case close contacts with the individual are also self-harming. Occasionally schools discover that a number of students in the same peer group are harming themselves.

Related School Policies and Procedures are:

- School Statement on Confidentiality
- Confidential Counselling Service Information

- Anti-Bullying Policy
- Child Protection and Safeguarding Policy
- Drugs and Substance Abuse Policy
- First Aid Policy
- Health, Safety and Wellbeing Policy
- Behaviour Policy

ANNEX H

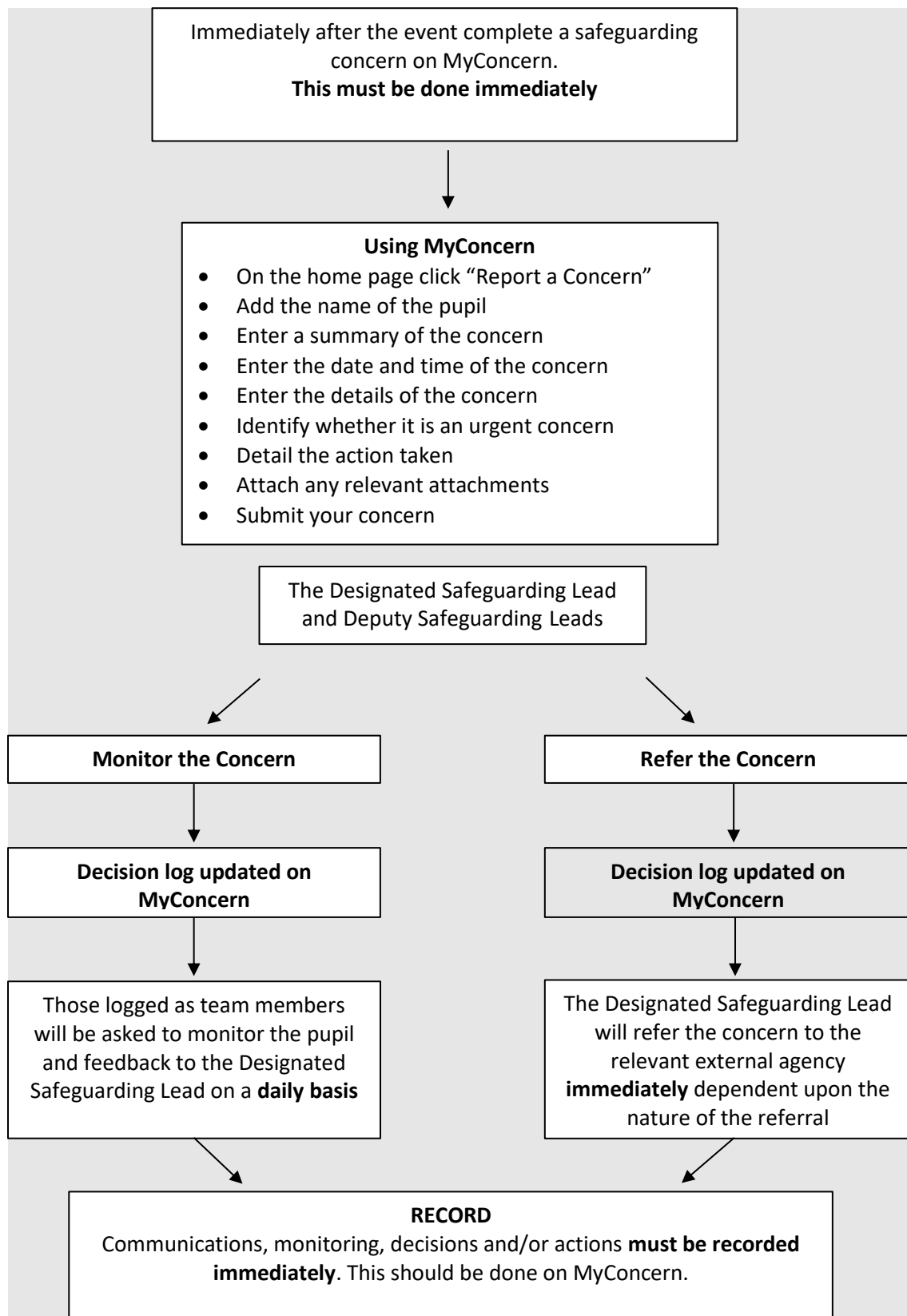
Guidance on responding to a child making an allegation of abuse

1. Stay calm.
2. Listen carefully to what is said and show that you are taking it seriously.
3. Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
4. Tell the child that the matter will only be disclosed to those who need to know about it.
5. Allow the child to continue at their own pace.
6. Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
7. Reassure the child that they have done the right thing in telling you.
8. Tell them what you will do next, and with whom the information will be shared (this is the School's DSL or Deputy DSL, or with the Chair of Governors if the allegation is against the Head).
9. Make no judgement about what you have heard.
10. At the earliest opportunity record in writing what was said, using the child's own words as far as possible. Note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated. When recording names, of both pupils and staff, full names should be recorded, not initials, in order to avoid any ambiguity of identity.
11. Remember that whilst you may have been the first person encountering an allegation of abuse it is not your responsibility to decide whether abuse has occurred. That is a task for the professional child protection agencies, following a referral from the School's Designated Safeguarding Lead.

[Responding to a Child's Disclosure of Abuse](#) – NSPCC Learning

ANNEX I

PROCEDURE FOR REPORTING A CONCERN



Record-keeping:

- We will hold records in line with our records retention schedule.
- All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on MyConcern – a secure, electronic safeguarding platform. If you are in any doubt about whether to record something, discuss it with the DSL.
- Records will include:
 - A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome
- Concerns and referrals will be kept in a separate child protection file for each child.
- Any non-confidential records will be readily accessible and available.
- Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:
 - **5 days** for an in-year transfer, or within
 - **The first 5 days** of the start of a new term
- In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

ANNEX J

PASTORAL REFERRAL PROCEDURE



Issues which would prompt a Child Protection Referral

The following is an indicator guide of the type of circumstances which would lead to a Section 47 assessment:

- Any allegation or suspicions about a serious injury/sexual abuse to a child
- Inconsistent explanation or an admission about a clear non-accidental injury
- A child being traumatised injured or neglected as a result of domestic violence.
- Repeated allegations involving suspicions of serious neglect
- Direct allegation of sexual abuse made by a child or abuser's confession to such abuse
- Any allegation suggesting connections between sexually abused children in different families or more than one abuser
- An individual (adult or child) posing a risk to children, any suspicious injury or allegation involving a child subject to a current child protection plan or looked after by a local authority
- No available parent and child vulnerable to significant harm
- Suspicion that child has suffered or is at risk of significant harm due to fabricated or induced illness,
- Child subject to parental delusions
- A child at risk of sexual exploitation or trafficking
- Pregnancy in a child aged under 13
- A child at risk of FGM, honour based abuse or forced marriage.

ANNEX K

Designated Safeguarding Lead (DSL) Job Description

The DSL will take lead responsibility for safeguarding and child protection across the school (including online safety and understanding the filtering and monitoring systems in place). They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of children.

They will advise and support other members of staff on child welfare, safeguarding and child protection matters, and liaise with relevant agencies such as the local authority and police.

Some safeguarding activities may be delegated to deputies, but the DSL will retain ultimate lead responsibility for safeguarding and child protection.

Duties and responsibilities

Managing referrals

- › Refer cases of suspected abuse and neglect to the local authority children's social care
- › Support staff who make referrals to the local authority children's social care
- › Refer cases to the Channel programme where there is a radicalisation concern
- › Support staff who make referrals to the Channel programme
- › Refer cases to the Disclosure and Barring Service where a person is dismissed or leaves due to risk or harm to a child
- › Refer cases to the police where a crime may have been committed

Working with staff and other agencies

- › Act as a source of support, advice and expertise for all staff
- › Act as a point of contact with the safeguarding partners
- › Inform the Headmistress of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and the requirement for pupils to have an appropriate adult
- › Liaise with the case manager and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- › Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- › Liaise with the mental health support team, where safeguarding concerns are linked to mental health
- › Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

- › Work with the Headmistress and relevant strategic leads, taking lead responsibility for promoting educational outcomes by:
 - Knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced
 - Identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school
- › The above includes:
 - Ensuring the School knows which children have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
 - Supporting teaching staff to provide additional academic support or reasonable adjustments to help these children reach their potential

Managing the child protection file

- › Ensure child protection files are kept up to date
- › Keep information confidential and store it securely
- › Make sure records include:
 - A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome
- › Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE)
- › Where children leave the school (including in year transfers):
 - Ensure their child protection file is securely transferred to the new school as soon as possible, separately from the main pupil file, with a receipt of confirmation, and within the specified time set out in KCSIE
 - Consider whether it would be appropriate to share any additional information with the new school before the child leaves, to help them put appropriate support in place

Raising awareness

- › Ensure each member of staff has access to, and understands, the school’s child protection policy and procedures, especially new and part-time staff
- › Work with the governing board to ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly
- › Ensure the child protection policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the school in this
- › Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements

- › Help promote educational outcomes by sharing information with teachers and school leadership staff about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing
- › Providing, with the Headmistress, an annual report for the Board of Governors, detailing - any changes to the policy and procedures; training undertaken by the DSL and deputy DSL, all staff and governors; the number and type of incidents/cases; and the number of children on the child protection register (anonymised).

Training

- › Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the ‘Training, knowledge and skills’ section of annex C
- › Undertake Prevent awareness training
- › Refresh knowledge and skills at regular intervals and at least annually

Providing support to staff

- › Organise child protection training for all school staff (including induction training for all newly appointed staff), in accordance with Keeping Children Safe in Education September 2023, and arranging refresher training for the Headmistress and all other Staff with pastoral responsibilities every two years. All staff receive an annual refresher INSET on child protection and safeguarding.
- › Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters
- › Support staff during the referrals process
- › Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support
- › Ensuring that the DDSLs are trained to the same standard as the DSL.

Understanding the views of children

- › Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them
- › Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding and sharing information

- › Understand the importance of information sharing, both within the school, with other schools and colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners

- › Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- › Keep detailed, accurate, secure written records of concerns and referrals

The DSL will be required to safeguard and promote the welfare of children and young people, and follow school policies and the staff code of conduct.

During term time, the DSL should always be available during school hours for staff in the school to discuss any safeguarding concerns. Ideally this will be in person, but can also be via phone or video call in exceptional circumstances.

Please note that this list of duties is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks that the DSL will carry out. The postholder may be required to do other duties appropriate to the level of the role.

This job description may be amended at any time in consultation with the postholder.

ANNEX L

Safeguarding (including behaviour and attendance) of pupils at City Junior School, from September 2023

Introduction

From September 2023 all Year 5 and Year 6 pupils on roll at City of London School for Girls (CLSG) will be educated on a different site, City Junior School (CJS). CJS is located at the following address:

4 Gray's Inn Place, London WC1R 5EY.

On occasion, Year 5 and Year 6 pupils will return to CLSG for some educational and co-curricular activities, for example weekly PE and Games lessons. CLSG is located at the following address:

St Giles' Terrace, London, EC2Y 8BB

As CLSG pupils, all Year 5 and Year 6 pupils are subject to the policies and procedures of CLSG. Many pupil-facing policies at CLSG cite the School's values. Accordingly, Year 5 and Year 6 pupils are expected to live out the values of CLSG: Respect, Responsibility, Resourcefulness.

During the time that Year 5 and Year 6 pupils spend at CJS they are also expected to adhere to all CJS policies and procedures and live out the values of CJS.

Whilst CLSG and CJS will work together to ensure the Year 5 and Year 6 pupils are kept safe and that CJS meets the needs of the pupils, CLSG is ultimately responsible for the safeguarding of Year 5 and Year 6 pupils during their education at CJS:

"Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil." (KCSIE 2023 paragraph 326)

CJS is not an alternative provision provider, but the KCSIE provisions in relation to alternative provision have been considered in this policy.

Safeguarding Contacts

School	City of London School for Girls	City Junior School
Head	Jenny Brown brownj@clsg.org.uk 020 7847 5500	Rachel Thompson r.thompson@cityjuniorschool.org.uk 020 3814 3506
Designated Safeguarding Lead	Susie Gilham gilhams@clsg.org.uk 020 7847 5573	Rachel Thompson r.thompson@cityjuniorschool.org.uk 020 3814 3506

Deputy Designated Safeguarding Lead **Justine Venditti**
vendittij@clsg.org.uk
020 7847 5513

Caroline Wright
c.wright@cityjuniorschool.org.uk
020 3814 3506

Deputy Designated Safeguarding Lead **Elly Nicoll**
nicholle@clsg.org.uk

020 7847 5500

Lucy Szemerenyi
l.szemerenyi@cityjuniorschool.org.uk
020 3814 3506

A complete list of the safeguarding team at CLSG, as well as the details for local agencies and safeguarding partners, are listed on Pages 1 and 2 of the CLSG safeguarding policy.

Training

As part of their annual statutory safeguarding training, all staff and governors at both CLSG and CJS are given specific instruction by the DSL at CLSG which explains how safeguarding concerns should be raised and recorded for Year 5 and Year 6 pupils. This training at each of CJS and CLSG is delivered in person on the respective sites before the start of the academic year. The procedure for responding to a safeguarding concern about a Year 5 and Year 6 pupil by a member of CJS staff is set out below.

Safeguarding and recording safeguarding disclosures/incidents

Any safeguarding concern which is raised regarding a Year 5 and Year 6 pupil should be referred as soon as practicable to the DSL at CJS. The DSL at CJS should then refer the concern as soon as possible to the DSL at CLSG. The DSL at CLSG has the ultimate responsibility of safeguarding the Year 5 and Year 6 pupils and is responsible for any referrals which subsequently need to be undertaken. They should be supported, as required, by the DSL at CJS and staff at CJS.

Record-keeping

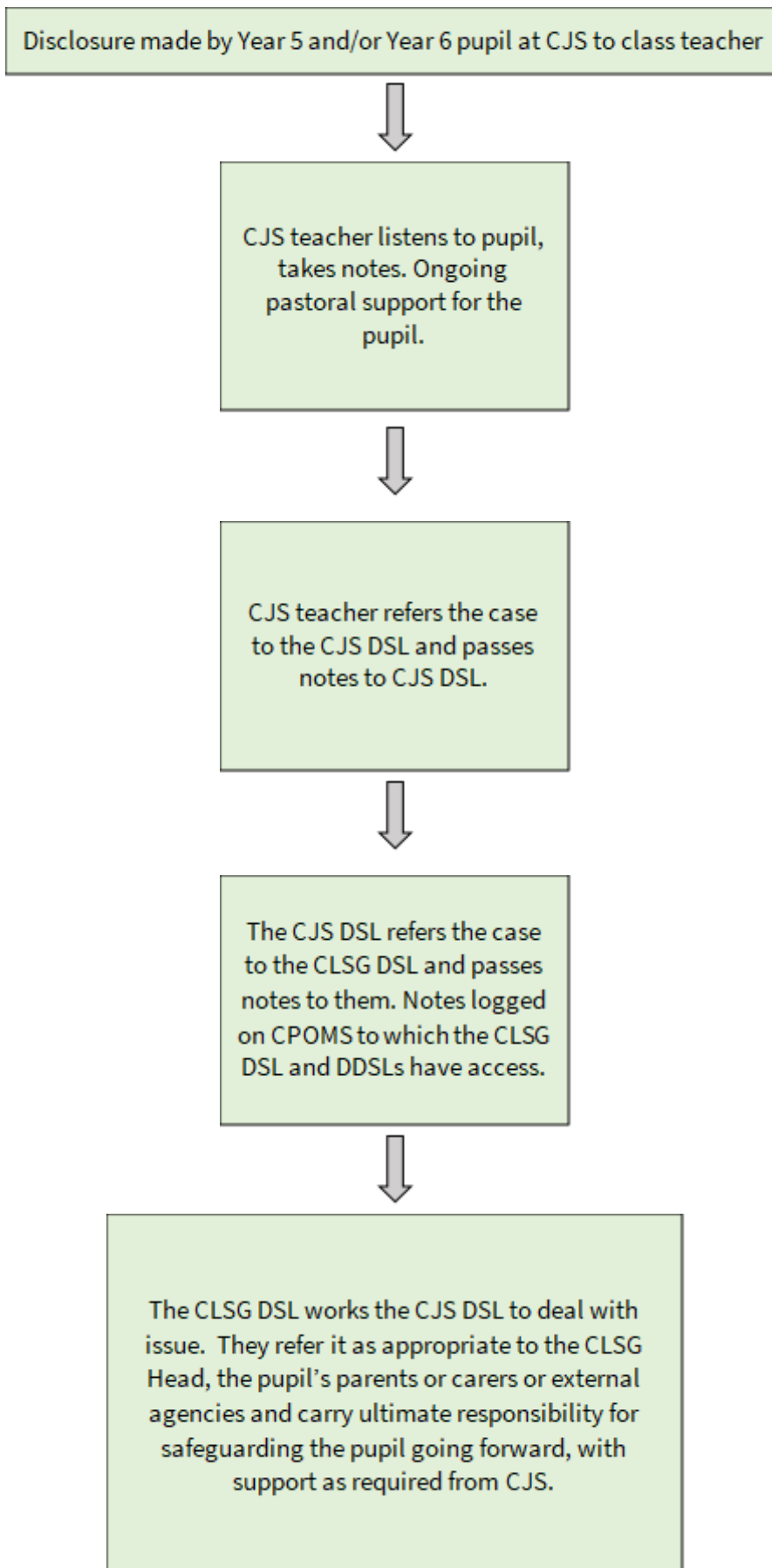
The DSL and DDSLs at CLSG have access to the CJS CPOMS system. In any case where a safeguarding issue arises in respect of a Year 5 and Year 6 girl, irrespective of whether the incident occurs on CJS or CLSG sites, the issue should be recorded using CPOMS.

It is the responsibility of DSL at CLSG to liaise with the DSL at CJS to ensure that safeguarding and pupil welfare records at CJS are accurate and up to date. Checks of such records should be routine (at least weekly) by the CLSG DSL.

The DSL at CLSG will routinely report to the CLSG safeguarding committee any safeguarding and/or welfare concerns that relate to Year 5 and Year 6 girls. Minutes of these meetings will be taken and securely stored using CLSG systems. The DSL at CLSG will routinely (at least weekly) report any Year 5 and Year 6 pupil safeguarding or welfare concerns to the Head at CLSG. Serious/urgent safeguarding concerns will be reported to the Head by the DSL at CLSG as soon as is practicable.

If urgent safeguarding issues arise during Year 5 and Year 6 pupil visits to CLSG, any member of the CLSG safeguarding team may be called upon to assist in line with the usual CLSG's safeguarding procedures. All such cases will be referred to the DSL at CJS in a timely manner.

Process to be followed in case of a safeguarding disclosure by/incident concerning an Year 5 and Year 6 pupil at CJS



Behaviour

CJS is responsible for the day to day behaviour management of Year 5 and Year 6 pupils and pupils are required to adhere to the expectations for behaviour as set out in the CJS Behaviour Policy.

CJS will share all incidents of poor pupil behaviour with the DSL at CLSG routinely (at least weekly).

Any serious behavioural issues that emerge should be referred in a timely way to the CLSG DSL. Where such incidents, whether isolated or repeated, require investigation, such investigations should be conducted under the instruction of the DSL at CLSG and in accordance with the CLSG Behaviour Policy. All such investigations should be conducted using the CLSG Investigation Procedure which is available from the CLSG DSL on request. Completed investigation reports should be stored against pupil files on CPOMS.

In such cases where CJS pupils are issued with a sanction that amounts to an equivalent 'major sanction' in accordance with the CLSG behaviour policy (for example a temporary or permanent exclusion), these should be recorded on the CLSG record of major sanctions in accordance with the CLSG Behaviour Policy.

Year 5 and Year 6 pupils will be reminded of the particular values and behavioural expectations at CLSG by their form teachers.

Attendance

Year 5 and Year 6 pupils will be registered twice daily by CJS staff using the CLSG iSAMS system. All members of staff at CJS have access to this system and will be given appropriate training before the start of the academic year.

It is the responsibility of staff at CJS to follow up daily pupil absence regarding Year 5 and Year 6 pupils and to ensure an accurate dataset is recorded. Daily absence of Year 5 and Year 6 pupils should, in the first instance, be followed up by CJS staff in accordance with the CJS Attendance Policy. The CLSG Attendance Officer is responsible for following up patterns of pupil absence and reporting these to the DSL at CLSG.

Where there are concerns around poor attendance of Year 5 and Year 6 pupils, irrespective of whether such concerns constitute a safeguarding concern, these should be communicated to the CLSG DSL in a timely way in order that these can be acted on as appropriate by the DSL at CLSG.

Medical

All visits to the medical centre by Year 5 and Year 6 pupils, irrespective of whether they are treated by a nurse at CJS or CLSG, should be recorded centrally on the ISAMS medical module. These are therefore accessible to the medical teams at both CJS and CLSG.

Policy Revised: September 2016, June 2017, September 2018, January 2019, September 2019, September 2020, September 2021, May 2022, September 2023

Approved by the Board of Governors: September 2023

Date next review due: September 2024