



HAMPTON COURT HOUSE

FORTITER IN RE SUAVITER IN MODO

Safeguarding and Child Protection Policy and Procedures

Reviewed by: The Safeguarding Team (JAC, KHC, RCB)
Authorised by: Governing Body

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KEY EXTERNAL AGENCIES, SERVICES AND PROFESSIONALS:

Single Point of Access (SPA) Achieving for Children	1st Floor, Civic Centre 42 York Street Twickenham TW1 3BW	020 8547 5008 for out of hours / weekends Tel. 020 8770 5000 spa@richmond.gov.uk
Multi-Agency Safeguarding Hub (MASH)	lscb-support@achievingforchildren.org.uk	
Local Authority Designated Officer (LADO) Alice Stott	Achieving for Children Guildhall II Kingston Upon Thames	(contact via SPA) 020 8547 5008 spa@richmond.gov.uk
Police Child Abuse Investigation Team (CAIT)	Feltham Police Station 34 Hanworth Road Feltham TW13 5BZ	020 8247 6331

Police non-emergency point of contact 101

Richmond Safeguarding Children Partnership	44 York Street Twickenham TW1 3BZ	07834 386459 lscb-support@kingrichlscb.org.uk
Child and Family Consultation Service	Richmond Royal Hospital Kew Foot Road Richmond TW9 2TW	020 8772 5661

NSPCC 0808 800 5000

'Prevent' Contacts DfE contact: 020 7340 7264
counter.extremism@education.gsi.gov.uk

Forced Marriage Unit Contact: 020 7008 0151
fmu@fco.gov.uk

In an emergency if you think a child is in immediate danger you should call 999.



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HAMPTON COURT HOUSE

FORTITER IN RE SUAVITER IN MODO

Safeguarding and Child Protection Policy and Procedures

Statement of Intent

Safeguarding and Child Protection Policy and Procedures for Hampton Court House and Hampton Court House Daycare (hereafter known as Hampton Court House or HCH).

Introduction

Hampton Court House recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation.

The procedures contained in this policy apply to all staff (teaching and non-teaching) and governors and are consistent with the principles established by

- the Children Acts 1989 and 2004;
- the Education Act 2002;
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school;
- 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 Childcare (Disqualification) and Children’s (Early Years Provision Free of Charge) (Extended Entitlement) (amendment) Regulations 2018 (referred to in this policy as the “2018 Childcare Disqualifications Regulations”) and Childcare Act 2006, which set out who is disqualified from working with children.

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage; and in line with government publications:

- Working together to safeguard children (2015),
- Keeping children safe in education (KCSIE as updated for September 2019),
- Children Missing Education (2016) and
- the Richmond Local Safeguarding Children Board (LSCB) and the Pan London Child Protection Procedures (2015).

HCH's safeguarding culture, policy and procedures are also informed by *What to do if you are worried a child is being abused – advice for practitioners* (March 2015), *Prevent Duty Guidance of England and Wales* (March 2015) and *Safeguarding Children and Young People* (Charity Commission policy paper July 2014).

Policy Statement

This policy is one of a series in the school's integrated safeguarding portfolio. We act within the government's safeguarding guidelines to ensure that every child stays safe, enjoys his/her learning and achieves well.

In addition to on-going training and refresher sessions, every member of staff (teaching and nonteaching) makes an annual declaration to the effect that this policy has been read and understood. We require also annual confirmation from our staff that as a minimum Part 1 and Annex A (safeguarding information for all staff) of *Keeping Children Safe in Education* (September 2019) and *What to do if you're worried a child is being abused* (2015) have been read and understood.

We ask that if anyone sees or witnesses anything that compromises our commitment to safeguarding children, that this be brought swiftly to attention of a member of the Safeguarding Team (See page 5).

Our Safeguarding Principles

- It is the school's responsibility to safeguard and promote the welfare of children.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Children who feel safe make more successful learners.
- Representatives of the whole-school community of pupils, parents, staff and governors are involved in policy development and review.
- Policies are reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance.
- All pupils and staff involved in safeguarding issues will receive appropriate support from the senior leadership team who will follow this policy guidance in doing so.

Aims

- To provide all staff with the necessary information to enable them to meet their moral and statutory responsibilities to promote and safeguard the wellbeing of children.
- To ensure consistent good practice across the school.
- To demonstrate the school's commitment with regard to safeguarding children.
- To prevent harm by (a) providing excellent pastoral care; (b) ensuring that appropriate staff are properly recruited and trained; (c) teaching pupils, through PSHE and a varied curriculum to identify, reduce and manage risks. This includes educating pupils about the safe use of electronic equipment and access to the internet; and (d) promoting an ethos where pupils feel secure and able to talk.
- To raise awareness of all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases, or supposed cases, of abuse including radicalisation, child sexual exploitation and online grooming and abuse.
- To emphasise the need for open channels of communication between all members of staff.

Terminology

- Safeguarding is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe, effective and nurturing care; and taking action to enable all children to have the best outcomes.

- Child protection refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance in respect of those children who have been identified as suffering, or being at risk of suffering, harm.
- Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.
- 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.
- Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children
- Staff refers to all those working for or on behalf of the school, full-time or part-time, in either a paid or voluntary capacity.
- Child refers to all young people who have not yet reached their 18th birthday.
- Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Context

Section 175 of the Education Act 2002 requires local education authorities and school governors to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

Section 87(1) of the Children Act 1989 and Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 require proprietors of independent schools to have arrangements to safeguard and promote the welfare of children who are pupils at the school.

Research

Research suggests that more than 10 per cent of children will suffer some form of abuse. Due to their day-to-day contact with children, school staff are uniquely placed to observe changes in children's behaviour and to recognise the outward signs of abuse. Children may also turn to a trusted adult in the school when they are in distress or at risk. It is vital that school staff are alert to the signs of neglect and abuse and understand the local procedures for reporting and acting upon their concerns.

The Safeguarding Team

The Safeguarding Team comprises the following designated persons for safeguarding & child protection:

JOSE ALVAREZ-CAMPOS,	Designated Safeguarding Lead	Direct line: 020 8614 0855 Email: jac@hchnet.co.uk
KATIE HAGER-CONROY,	Safeguarding Co-ordinator	Email: khc@hchnet.co.uk
RACHEL BOWLES,	Deputy DSL	Email: rcb@hchnet.co.uk
SARA FOLKES,	Associate Member Early Years Specialist	Email: srf@hchnet.co.uk
JANAK ODEDRA,	Associate Member	Email: jvo@hchnet.co.uk

The nominated safeguarding governor for Hampton Court House is:

TRISTRAM JONES-PARRY,	Email: tjp@hchnet.co.uk
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The nominated safeguarding governor liaises with the local authority and other agencies in the event of an allegation being made against the Headmaster, the Chair of Governing Body, or the Proprietor(s) of the School.

Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school. Our policy and procedures also apply to extended school and off-site activities.

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, *Keeping Children Safe in Education*, and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education.
- The early help 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.
- 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 may be expected to play.
- 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.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation.

The Safeguarding Team co-ordinates child protection arrangements at Hampton Court House. The Designated Safeguarding Lead (DSL) for safeguarding and child protection is the Head of Pastoral Care, Jose Alvarez-Campos. The DSL is a member of the Senior Leadership Team, and takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss and safeguarding issues. When the DSL is absent, the deputies will act as cover.

The Proprietors and Governing Body of Hampton Court House

The Proprietors through the Governing Body ensures that the school has:

- a DSL for safeguarding and child protection who is a member of the senior leadership team and who has undertaken the approved KRSCP training in inter-agency working, in addition to basic child protection training.
- child protection policy and procedures that are consistent with KRSCP requirements, reviewed annually and made available to parents on request.
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headmaster or a proprietor.
- safer recruitment procedures that include the requirement for appropriate checks in line with national guidance.
- a training strategy that ensures all staff, including the Headmaster, governing body members and proprietors, receive child protection training, with refresher training at three-yearly intervals. The DSL should receive refresher training at two-yearly intervals.
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding & child protection.

Designated Safeguarding Lead

It is the responsibility of the Proprietors through the Governing Body to ensure that the DSL:

- is appropriately trained.
- acts as a source of support and expertise to the school community.

- has an understanding of Local Safeguarding Children Boards procedures¹.
- keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file.
- refers cases of suspected neglect and/or abuse to children's social care or police in accordance with this guidance and local procedure (see below at footnote).
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation.
- ensures that when a child with a child protection plan leaves the school, his/her information is passed to the new school and the child's social worker is informed.
- attends and/or contributes to child protection conferences in accordance with local procedure and guidance.
- co-ordinates the school's contribution to child protection plans.
- develops effective links with relevant statutory and voluntary agencies.
- ensures that all staff sign to indicate that they have read and understood this policy.
- ensures that this safeguarding and child protection policy is updated annually.
- liaises with the nominated governor as appropriate.
- maintains a record of staff attendance at child protection training – (and that this be also reported to Richmond upon Thames LSCB via the Local Authority).
- makes this policy available to parents.

Additional Members of The Safeguarding Team

The Safeguarding Team (see page 3) include two Deputy DSLs who are appropriately trained to the same standard as the DSL and, in the absence of the DSL, carry out those functions necessary to ensure the on-going safety and protection of children. In the event of the long-term absence of the DSL, one of the Deputy DSLs will be appointed Acting DSL and will assume all of the functions above.

The Safeguarding Team also includes two Associate Members who attend safeguarding meetings and support the work of The Safeguarding Team. They are gaining the experience and training required of a DSL but do not assume the full responsibilities of the Team, and have limited access to confidential information, for example emails sent to safeguarding@hchnet.co.uk will not automatically be forwarded, and will be considered on a case-by-case basis.

The Headmaster

- Ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff.
- Allocates sufficient time and resources to enable The Safeguarding Team members to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures (Hampton Court House's *Whistleblowing Policy* is available on the internal server).
- Ensures that child's safety and welfare is addressed through the curriculum.
- Ensures the relevant staffing ratios are met, where applicable;
- Makes sure each child in the Early Years Foundation Stage is assigned a key person

¹ Please note that Richmond upon Thames LSCB operates local procedures which are based upon and aligned to regional and national procedures in respect of safeguarding children and child protection. For local procedures visit: www.proceduresonline.com/richmond/childcare and for regional visit: www.londoncp.co.uk. For national procedures visit: www.workingtogetheronline.co.uk.

Our Commitment to Safer Recruiting

- We practise safer recruitment by checking suitability of staff and volunteers to work with children and young people in accordance with the guidance given in *Safeguarding Children and Safer Recruitment in Education* and the Education (Independent School Standards) (England) Regulations 2014.
- Accordingly applicants for staff and voluntary posts must be willing to undergo child protection screening appropriate to the post, including references from previous employers, and a DBS (Disclosure and Barring Service) check at the enhanced level.
- Interviews will be conducted in person by either the Headmaster or Deputy Head (both of whom are in safer recruitment procedures), and they will explore candidates' suitability to work with children.
- We further confirm that where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) and that person was considered unsuitable to work with children, that no compromise agreement will be entered into which prevents reporting and that a prompt and detailed report will be made to the DBS within one month of that person leaving the school; the address for referrals is PO Box 181, Darlington, DL1 9FA (tel. 0300 123 1111).

Good Practice Guidelines

To meet and maintain our responsibilities towards children, the school community agrees to the following standards of good practice;

- treating all children with respect
- setting a good example by conducting ourselves appropriately
- involving children in decision-making which affects them
- encouraging positive and safe behaviour among children
- being a good listener
- being alert to changes in child's behaviour
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding all of the school's safeguarding and guidance documents on wider safeguarding issues, for example bullying, physical contact, e-safety plans and information sharing
- asking the child's permission before doing anything for them which is of a physical nature, such as assisting with dressing, physical support during PE or administering first aid
- maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse
- staff should always avoid behaviour which might be misinterpreted by others, and report any incident with this potential.

Abuse of Trust and Inappropriate Relationships

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care.

A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff should note that it is a criminal offence for a person aged 18 or over and in a position of trust to

- a. intentionally touch a child in a sexual way;
- b. have a sexual relationship with a child, even if the relationship is consensual;
- c. cause or incite a child to engage in sexual activity;

- d. intentionally engage in sexual activity in the presence of a child; or
- e. for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image or any person engaging in a sexual activity.

A position of trust could arise even if the member of staff does not teach the child. A child for these purposes is a person under the age of 18.

The school's Code of Ethical Practice sets out our expectations of staff (see: Appendix 1 – Code of ethical practice).

Children who may be Particularly Vulnerable

Some children may be at increased risk of neglect and or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give particular consideration and attention to children who are:

- disabled or have special educational needs
- are young carers
- at risk of FGM
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- is frequently missing or goes missing from care or home
- living in a known domestic abuse situation
- affected by known parental substance misuse
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living in chaotic, neglectful and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- do not have English as a first language.

Special consideration includes the provision of safeguarding information, resources and support services in community languages and accessible formats.

Support for those involved in a child protection issue

Child neglect and abuse are devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a child, a separate link person will be nominated to avoid any conflict of interest
- responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of help lines, counselling or other avenues of external support
- following the procedures laid down in our whistle blowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies.

Complaints procedure in respect of poor practice behaviour

Our complaints procedure will be followed where a child or parent raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child, using sarcasm or humiliation as a form of control, bullying or belittling a child or discriminating against them in some way. Complaints are managed by the Headmaster and governors.

Complaints from staff are dealt with under the school's grievance and disciplinary procedures.

If you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's Whistle-Blowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported to the Headmaster. Complaints about the Headmaster or a proprietor should be reported to the nominated safeguarding governor.

Staff who are the subject of an allegation

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some adults do pose a serious risk to children's welfare and safety and we must act on every allegation made.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff should be reported to the Headmaster. Allegations against the Headmaster or a proprietor should be reported to the nominated safeguarding governor (See Section 5).

Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff and governors will receive training during their induction. All staff and governors will receive training that is updated annually and members of The Safeguarding Team will receive training updated at least every two years, including training in inter-agency procedures; providing advice and support to staff on protecting children from radicalisation; participation in child protection conferences; supporting children in need; record keeping and promoting a culture of listening to children; safer recruitment.

New staff will receive training on appointment as part of their induction which is overseen by the DSL or Deputy DSL and which includes:

- this policy;
- the Staff Code of Conduct (including the ICT acceptable use policy);
- the identity of the Safeguarding Team and the mobile numbers of the DSL and Deputy DSLs (to be stored on their phones in case of emergency)
- a copy of Part One and Annex A of KCSIE;
- Prevent training;
- a copy of *What to do if you are worried a child is being abused* (2015);

- the Whistleblowing policy.

Induction training will be completed before a member of staff or volunteer begins any work for the school that involves unsupervised contact with children;

All staff will be required to sign to confirm that they have read, understood and agreed to comply with the requirements outlined in these documents. Further, to assist staff in understanding KCSIE, there will be regular updates at staff meetings, spot checks by the DSL, the Deputy DSL and the nominated safeguarding governor, quizzes, email bulletins ('from the HCH Safeguarding Team'), referral flow charts and so on.

'Early Help'

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of *Working together to safeguard children* provides detailed guidance on the early help process.

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

Effective Early Help

Effective early help is reliant upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.

Early Help Assessments

For an Early Help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents and should involve the child and their family as well as all of the professionals who are working with them;
- a teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority; and
- if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

Effective early help in a school setting involves the school (under the guidance of the DSL or a Deputy DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to improve significantly the outcomes for the child. It is hoped that in each case, this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to children's social care if the child's situation does not appear to be improving.

Safer Recruitment

HCH endeavours to ensure that it employs 'safe' staff by following the guidance in *Keeping Children Safe in Education* together with the local authority and the school's individual procedures.

The definition of regulated activity (i.e. work that a barred person must not do) in relation to children comprises, in summary:

- unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on well-being, or drive a vehicle only for children;
- work for a limited range of establishments ('specified places'), with opportunity for contact: e.g. schools, children's homes, childcare premises. Not work by supervised volunteers;

Safer recruitment means that all applicants will:

- complete an application form;
- provide two referees, including at least one who can comment on the applicant's suitability to work with children;
- provide evidence of identity and qualifications;
- be checked through the DBS (Disclosure and Barring Service) as appropriate to their role;
- be interviewed by at least one person trained in safer recruitment.

All new members of staff will undergo an induction that includes familiarisation with the school's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs. All staff sign to confirm they have received and understood KCSIE part one and HCH's Safeguarding and Child Protection policy (see: Appendix 1 – Code of ethical practice).

Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our children attend off-site activities (for example the biennial 'Middle Years Adventure'), we will check that effective safeguarding arrangements are in place.

Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect children we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications);
- seek parental consent;
- ensure that children are appropriately dressed;
- encourage children to tell us if they are worried about any photographs that are taken of them.
- HCH has a clear policy that only designated school cameras and iPads may be used taking photographs of children; it is not permitted to use personal phones to take photographs of students.

Further guidance for staff on the taking and storing of photographs and images of pupils can be found in the HCH document *Guidelines for taking photographs of students at HCH*.

CCTV is located around the School but is not installed in changing or toilet areas.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues – some of which are listed below. Staff should be aware that behaviours such as drug-taking, alcohol abuse, truanting and sexting put children in danger.

Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also

at www.nspcc.org.uk. Staff can also access broad government guidance on the issues listed below via the GOV.UK website:

- bullying including cyberbullying
- domestic violence
- child missing from home or care
- child sexual exploitation (CSE)
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- peer-on-peer abuse
- gender-based violence/violence against women and girls
- hate
- missing children and adults
- preventing radicalisation
- private fostering
- sexting
- teenage relationship abuse
- trafficking
- voyeurism ('upskirting')

Non-Governmental Organisation (NGO) advice is also available regarding other safeguarding issues, as follows:

- eating disorders
- self-harm

Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under the school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting and voyeurism)

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging *any* form of derogatory or sexualised language or behaviour, including requesting or sending sexual images, or homophobia
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Regular recorded meetings with Form Tutors, HoDs and teaching staff to ensure that areas are identified early and referred to the appropriate lead.

Children missing from education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

A child going missing from school or home is a potential indicator of abuse or neglect including sexual abuse and sexual exploitation. All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any pupil missing from school. These procedures have regard to relevant statutory and LSCB guidance in respect of *School attendance* (DfE, November 2016), *Statutory guidance: children who run away or go missing from home or care* (DfE, January 2014), *Children Missing Education* (September 2016).

Please see HCH's separate Attendance Policy and Missing Child Policy. These procedures include

- safeguarding responses to children who go missing from education, particularly on repeat occasions, which help identify the risk of abuse and neglect and which help to prevent the risks of the child going missing in future;
- the requirement
 - to record any incident, the action taken and the reasons given by the pupil for being missing;
 - to notify the local authority when the school is about to remove or add a pupil from or to the school admission register at a non-standard transition point.

All staff are aware of their roles to protect children from going missing in education.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

Serious Violence

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

It is important that staff are aware that any child may be approached by these groups, especially if they don't fit the 'usual' type of child involved with these groups. All staff should be aware of the associated risks and understand the measures in place to manage these. Further advice can be found

in the Home Office's *Preventing youth violence and gang involvement* and its *Criminal exploitation of children and vulnerable adults: county lines* guidance.

'Honour based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to a member of the school safeguarding team. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

There are a range of potential indicators that a child may be at risk of HBV. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (DfE, April 2016). Pages 59-61 focus on the role of schools.

If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi- agency liaison with police and children's social care.

Female Genital Mutilation (FGM)

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Hampton Court House staff are 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 it 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.

UK communities most at risk include Kenyan, Somalian, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean. Non-African communities that practise FGM include Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Staff 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. Warning signs that FGM may be about to take place include knowing both that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school. The child may also talk about a special procedure/ceremony that is going to take place. Indicators that FGM may already have occurred include prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems. Some teachers have described how children find it difficult to sit still and look uncomfortable, or may complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about.

There is a statutory reporting duty for all teachers in respect of FGM. Any teacher who discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she must personally report it to the police. Those failing to report such cases to the police will face disciplinary sanctions unless the teacher has good reason not to. Unless there is a good reason not to, the teacher should still consider and discuss the case with the school Safeguarding Team and involve the local authority as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through

disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow normal safeguarding procedures.

Staff may hear about the possibility of FGM happening or having happened to a pupil's family member, e.g. sister/female cousin:

- A teacher may hear reference to FGM in conversation between pupils;
- A child may confide that a sister/cousin is to have a 'special procedure' to become a woman;
- A child may report that their sister/cousin is going out of the country for a prolonged period;
- A child may disclose the worry about a sister/cousin being at risk;
- Parents may withdraw a child from any learning about FGM.

Forced Marriage

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

The Forced Marriage Unit has published Multi-agency guidelines (DfE, June 2014), with pages 32-36 focusing on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmufco.gov.uk.

Preventing Radicalisation

The referral procedures set out in this policy also apply where there are concerns about children who may have been drawn into terrorism. In accordance with the DfE Statutory Guidance 2015: Prevent Duty, Hampton Court House recognises its duty to have due regard to the need to prevent pupils from being drawn into terrorism and adopts appropriate protocols to minimise the risk. The Head of Pastoral Care is the designated prevent duty person responsible for co-ordinating action within the School and liaising with other agencies. Although HCH assesses the risk to be low at present, the School will implement prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials, discussing these dangers with pupils when appropriate in suitable forums, and undertaking Prevent awareness staff training periodically to ensure that staff are able to identify pupils at risk and know how to intervene.

The designated prevent duty person will also assess and manage appropriately any risks identified in the vicinity of the School, including those posed by any visiting speakers, and will maintain a register of all visiting speakers, who will always be checked in as suitable before being permitted to visit the School. The School will work in partnership with the Richmond LSCB over such matters; the level of risk will determine the most appropriate referral. Further information is available from the government Channel guidance on radicalisation.

There is no single way of identifying an individual who is likely to be vulnerable to being drawn into terrorism. It can happen in many different ways and settings. Specific background factors may contribute to vulnerabilities which are often combined with specific influences such as family, friends or online and with specific needs for which an extremist group may appear to provide an answer. The internet and use of social media in particular have become major factors in the radicalisation of young people. Factors that may have a bearing on someone becoming vulnerable include, but are not limited to: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race-hate crime, lack of self-esteem or identity and personal or political grievances.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status.

Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

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

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

Any concerns that a child is being, or is at risk of being, sexually exploited should be passed without delay to the DSL. The School is aware that a child may not be able to recognise the coercive nature of the abuse and may not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other victim of abuse.

Private Fostering

Children being privately fostered are required by law to be seen by a social worker. If a member of staff or volunteer becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with a member of the Safeguarding Team. They will then notify the Richmond Single Point of Access (SPA) who will check that the arrangements are suitable and safe for the child. Further information about private fostering can be found on the London Borough of Richmond upon Thames website or government advice on private fostering.

E-Safety

Hampton Court House adopts a whole school, holistic approach to online safety which

- captures the range and complexity of the risks and of children's experiences of those risks;
- seeks to mitigate those risks as far as is possible without depriving children of the significant benefits provided by technology and the internet; and
- handles all cases of online harm appropriately and with sensitivity.

All of our children will use mobile phones and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might

range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings, radicalisation or sexual predation.

The school's e-safety policy explains how we try to keep children safe in school. Cyber-bullying by children, via texts and emails, will be treated as seriously as any other type of bullying; specific guidance on this issue is given regularly throughout the year in tutorial groups and in assemblies. In addition, written guidance forms part of the School Rules and Code of Conduct, and also each child's *Almanack*, viz.

"Think very carefully before clicking 'send' or pressing 'enter'. You should never write anything online that you are not prepared to defend publically, to your parents and/or to the police."

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; this includes but is not limited to
 - violent pornography or sexual images which affect a child's perception of love and relationships;
 - material promoting harmful behaviours such as self-harm or eating disorders;
 - propaganda or material promoting extremism, radicalisation and/or terrorism;
 - material showing or depicting extreme violence or brutality; and
 - social media such as Instagram or Facebook which can provide children with distorted and unrealistic images of others' lives, causing some children to feel inadequate or distressed about their own lives.
- contact: being subjected to harmful online interaction with other users; this includes but is not limited to
 - cyber-bullying; and
 - contact from individuals seeking to groom children for the purposes of sexual abuse or radicalisation.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; this includes but is not limited to
 - responding to and engaging with individuals seeking to groom or abuse children;
 - youth produced sexual imagery.

The school will do all it reasonably can to limit children's exposure to the above risks when using our own IT systems, by having in place appropriate filters and monitoring systems which are designed to protect children from online abuse without "over blocking" or imposing unreasonable restrictions as to what children can be taught through online education.

Chat rooms and social networking sites are potential sources of inappropriate and harmful behaviour. Some children will undoubtedly be 'chatting' on mobiles or social networking sites at home (and increasingly on their way to and from school via mobile/4G connectivity); again we run numerous seminars on the possible risks throughout the year.

Hampton Court House holds evening forums during the school year to discuss e-safety concerns with parents. Our own e-safety partnership strategy with parents is complemented by our sending parents the E-Safety Adviser Newsletter, produced by independent e-safety adviser Alan MacKenzie (www.esafety-adviser.com).

For more information on e-safety see:

- www.richmond.gov.uk/lscb_strategy_2008.pdf
- www.thinkuknow.co.uk
- www.saferinternet.org.uk
- www.pshe-association.org.uk
- www.disrespectnobody.co.uk
- www.internetmatters.org
- www.educateagainsthate.com

- www.gov.uk/government/publications/the-use-social-media-for-online-radicalisation

Voyeurism ('Upskirting')

This is the practice of 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 under the Voyeurism (Offences) Act 2019.

The Sharing of Youth-Produced Sexual Imagery ('Sexting')

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps (such as Snapchat) has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Sexting refers to both images and videos where:

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult; and
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance *Sexting in schools and colleges: responding to incidents and safeguarding young people*.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving sexting they should follow the safeguarding procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and notify a member of the Safeguarding Team. Staff should not view, copy or print the imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Services Local Referral, Intervention and Assessment Service Team, or the police as appropriate.

Immediate referral at the initial review stage should be made to Children's Services Local Referral, Intervention and Assessment Service Team / police if:

- the incident involves an adult
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent;
- what is known about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or is violent;
- the imagery involves sexual acts;
- the imagery involves anyone aged 12 or under; and
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery – for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use his professional judgement to assess the risk to pupils involved and may decide, with input from the Safeguarding Team, to respond to the incident

without escalation to Children's Services Local Referral, Intervention and Assessment Service Team, or the police.

In applying judgement the DSL will consider if:

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual, ie at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image has been more widely distributed;
- there are other circumstances relating to either the sender or recipient that may add cause for concern, i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth-produced imagery before.

If any of these circumstances are present the situation will be escalated according to our safeguarding procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the School.

The DSL will record all incidents of sexting, including both the actions taken, actions not taken, reasons for doing so and resolution in line with safeguarding recording procedures.

Children with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Pupils with SEN and disabilities may require additional pastoral support.

Mobile phones and cameras

Pupils in Years 9 to 13 may use their mobile phones sensibly during the school day – though they must be switched off and out of sight during lessons. If a pupil needs to call home because he or she is feeling unwell, he or she must bring this to the attention to the relevant member of the staff **before** calling home.

Pupils in Years 8 and below may bring phones to school but their use during school hours (8.40 to 16.00) is prohibited. Misuse of a mobile telephone will result in confiscation.

The pupils are instructed that:

- Your telephone must be switched off during the day.
- Phones must be switched off and out of sight during lessons.
- You are not permitted to make telephone calls, send text messages or access the internet on your phone during school hours.
- You are not permitted to play any computer game on your mobile telephone during school hours.
- If you need to call home, you must ask permission from your form tutor.

- If your parents need to contact you during the day, they may do so through Reception, who will then pass on the message.

No pupil is allowed to use a phone's camera or recording facility within the school.

Mobile phones and cameras in the Early Years

Members of staff are asked not to use their mobile phones in the Daycare or Early Years area and to switch them off. However, we encourage them to take their phone outside and to store the following numbers:

- Emergency;
- School;
- Head of Early Years;
- Safeguarding Team.

Members of staff should not take photographs with their phone and should use the Daycare or Early Years camera instead.

Visitors are not allowed to use their mobile phone in the Early Years area and Daycare Centre or around the children. They are not allowed to take photographs of the children.

Parents are asked not to use their mobile phones in the Daycare Centre and Early Years area and not to take photographs. If they want photographs of their child, they can ask a member of staff to take some with the Daycare or Early Years camera, and these can be sent on to the parents.

Safeguarding and Child Protection Procedures

Recognising Harm, Significant Harm and Abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a young or immature child home alone, or leaving knives or matches within reach of an unattended toddler.

Children may be abused in a family or in a community setting (eg a school) by those known to them or, more rarely, by others (eg via the internet). They may be abused by an adult (male or female) or adults, or another child or children.

There are four categories of abuse (as defined in part one of *Keeping Children Safe In Education*: physical abuse, emotional abuse, sexual abuse and neglect. The following definitions are taken from *Working Together to Safeguard Children*:

Physical abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may feature age – or developmentally-inappropriate expectations being imposed on children. These may include interactions that are beyond the 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, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative and non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Neglect

Neglect 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. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate caretakers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Harm

The Children Act 1989 defines harm as: 'ill-treatment or the impairment of health or development'. 'Development' means physical, intellectual, emotional, social or behaviour development; 'health' means physical or mental health; and 'ill treatment' includes sexual abuse and forms of ill-treatment which are not physical. The definition of harm also includes 'impairment suffered by hearing or seeing the ill-treatment of another'.

Significant Harm

Significant harm refers to the 'threshold that justifies compulsory intervention in family life in the best interests of children, and gives Local Authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm'.

The legislation does not define the line between 'harm' and 'significant harm'. Staff should give 'significant' its ordinary meaning (ie considerable, noteworthy or important). The child's particular characteristics also need to be taken into consideration. For example, a child left home alone at the age of 3 could be at risk of significant harm, whereas a child of 13 years may be less likely so. The test will be subjective to the particular circumstances.

Whether the harm is significant is determined by comparing the child's health and development with what could reasonably be expected from a similar child. For example, if a child is failing to meet developmental or physical milestones, it is necessary to determine whether this is the result of a lack of 'good enough' parenting. There is no clearly-defined criteria to judge whether harm meets the threshold of 'significant' – it can be the result of a traumatic event or a compilation of acute and longstanding events. As highlighted in Working Together, 'Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm.'

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is known to result in a number of child suicides each year.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in form tutorials, assemblies and through the School's personal, social and health education (PSHE) curriculum.

Indicators of abuse and what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

A child who is being abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or others' safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help The Safeguarding Team to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

The impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the

rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking action

Key points to remember for taking action are:

- Report your concern to a member of The Safeguarding Team by the end of the day
- If a member of the Safeguarding Team is not available, or if you believe it appropriate, you should contact the Single Point of Access (SPA) on 020 8547 5008.
- Outside of office hours, weekends and public holidays, the Emergency Duty team should be contacted by phoning 020 8770 5000.
- Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly. The following link may be of use: <https://www.gov.uk/report-child-abuse-to-local-council>
- If you are seriously concerned about a child's immediate safety, always dial the police on 999
- Do **not** start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- Complete a record of concern
- Seek support for yourself if you are distressed.

If you suspect a child is at risk of harm

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their artwork could be bizarre or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are all right or if you can help in any way.

Use the welfare concern form (see: Appendix 2 – School welfare concern form) to record these early concerns. If the child does begin to reveal that they are being harmed you should follow the advice in the section 'If a child discloses to you'.

If, following your conversation, you remain concerned, you should discuss your concerns with the designated person.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the SLT and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger

- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related.

If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and/or abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
- Do not be afraid of silences – remember how hard this must be for the child.
- In no circumstances ask investigative (or ‘leading’) questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see a member of The Safeguarding Team. Otherwise let them know that someone will come to see them before the end of the day.
- Report the matter to a member of the Safeguarding Team.
- Write up your conversation as soon as possible in the child’s own words as far as possible (stick to the facts and do not put your own judgement on it) on the record of concern form and hand it (or email it) to a member of The Safeguarding Team.
- Seek support if you feel distressed.

A record of concern form is provided in Appendix 3 – Record of concern: Hampton Court House.

Notifying parents

The school will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children’s social care.

Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

The local safeguarding board will be informed and provided with evidence by the DSL or by the Safeguarding Governor within 24 hours of the initial disclosure.

Referral to Department of Education

DfE will be informed by a member of the Safeguarding Team of any actual abuse or allegations of abuse on the premises as soon as is practicably possible, certainly within 14 days of the initial disclosure.

Referral to Disclosure and Barring Service

Should any member of staff or volunteer be dismissed on the ground of a safeguarding concern the Disclosure and Barring Service will be informed within one month of the date of dismissal.

Children with sexually harmful behaviour

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than antibullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with members of The Safeguarding Team, or the nominated safeguarding governor (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

- Timely information sharing is essential to effective safeguarding
- 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
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL or deputies.

Child protection information will be stored and handled in line with Data Protection Act 2018 principles. Information is:

- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- kept no longer than necessary;
- processed in accordance with the data subject's rights;
- secure.

Record of concern forms and other written information in hard copies, will be stored in a locked facility (only members of the Safeguarding Team have access to this locked facility). Any electronic information will be password protected and only made available to relevant individuals. Members of the staff can make an electronic referral that it would be received only by the members of the Safeguarding Team. The members of the Safeguarding Team will then carry out an assessment of this information and will decide the next steps.

Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the Headmaster.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. However, any disclosure must be logged in the *Safeguarding Disclosures Record*.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if the situation is an emergency and no member of the Safeguarding Team is available. 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 the children. Further information can be found in the *Information Sharing: advice for practitioners providing safeguarding services* at gov.uk.

Appendix 1 – Code of ethical practice and policy acknowledgement

All school staff are valued members of the school community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our children.

All school staff are required to:

- place the safety and welfare of children above all other considerations;
- treat all members of the school community, including children, parents, colleagues and governors with consideration and respect;
- adhere to the principles and procedures contained in the policies in our safeguarding portfolio and in teaching and learning policies;
- treat each child as an individual and make adjustments to meet individual needs;
- demonstrate a clear understanding of and commitment to non-discriminatory practice;
- recognise the power imbalances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused;
- understand that school staff are in a position of trust and that sexual relationships with a child, even over the age of 16, is an offence;
- be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of harm;
- encourage all children to reach their full potential;
- never condone inappropriate behaviour by children or staff;
- take responsibility for their own continuing professional development;
- refrain from any action that would bring the school into disrepute;
- value themselves and seek appropriate support for any issue that may have an adverse effect on their professional practice.

Name:

Post: Date joined HCH:

Date of induction or most recent in-house safeguarding training:

Name of staff member responsible for that induction/training:

I confirm that I have received and read the

- the school's *Safeguarding & Child Protection Policy*,
- the school's *Staff Code of Conduct*,
- and *Keeping Children Safe in Education 2019 (Part One)*.

I have been made aware of my duty to safeguard and promote children's welfare.

The procedure for reporting concerns about a child has been explained to me and I understand it.

Signature: Date:



HAMPTON COURT HOUSE

FORTITER IN RE SUAVITER IN MODO

Appendix 2 – School welfare concern form

Use this form to record any concern about a child's welfare and give it to a member of the School's Safeguarding Team:

If you suspect the child may be suffering abuse or neglect, or you have received a disclosure of abuse from a child, or you have heard about an allegation of abuse, you must complete the child protection record of concern form instead, and hand it to a member of the Safeguarding Team.

You may prefer to email your concern. If so, do please use the headings below in your email.

Child's full name:.....

Date of this record:.....

Why are you concerned about this child?

What have you observed and when?

What have you heard and when?

What have you been told and when?

Have you spoken to the child?

Yes / No

What did they say? Use the child's own words

Have you spoken to anyone else about your concern?

Yes / No

Who?

Is this the first time you have been concerned about this child?

Yes / No

Further details

Date and time you handed (or emailed) this form to a member of the Safeguarding Team:.....

Your name:

Signature:



HAMPTON COURT HOUSE

FORTITER IN RE SUAVITER IN MODO

Appendix 3 – Record of concern: Hampton Court House

Child's details

Full name:.....

Address:.....

Telephone:.....

Date of birth:..... Male / Female

Is the child looked-after by the local authority or are there any other legal family arrangements?
(for example, a residence order) Yes / No

When was the child first admitted to this school?.....

Ethnicity and culture:.....

Religion:.....

Does the child have any disability or special educational need? Yes / No
Please specify

Preferred language of child:.....

Is any type of language support required to converse with the child? Yes / No
Please specify

Does the child know this form has been completed? Yes / No
If not, why not?

If yes, what did the child say?

Details of those with parental responsibility

Name(s):

Address:

Telephone:

Relationship to child:

Ethnicity, culture and religion of those with parental responsibility if known

Preferred language of those with parental responsibility

Is any type of language support required?

Do those with parental responsibility have any disability or special need?

How does this disability or special need affect the child?

Details of any siblings

Does the child regularly spend time with other carers, for example, after-school or holiday carers, or at a short break service?

Has a Common Assessment Framework (CAF) been completed for this child?

Yes / No

Please give date and reason for the CAF

Why are you concerned about this child?

Please provide a description of any incidents/conversations and the dates they occurred. You must make clear what is fact and what is opinion or hearsay. You must not ask the child leading questions or try to investigate the concern yourself

What have you observed and when?

(This relates to anything you have personally witnessed)

What have you been told and when?

(Write here anything you have been told by the child or any other person. Be clear about who has said what)

What have you heard and when?

(This may be third-party information that is relevant but as yet unsubstantiated)

If an allegation has been made, give any details you have about the alleged abuser

Date and time of this record

Your details

Full name:.....

Position:.....

Do those with parental responsibility know this form has been completed? Yes / No
If not, why not?

If yes, what did they say?

NOTE: Those with parental responsibility should not be contacted by anyone in the school if this could place the child at risk. Speak to the Headmaster or nominated governor first.

Does the child have any visible injury, or have they told you they have been injured? Yes / No

If yes, has medical advice been sought?

Has any action already been taken in relation to this concern? (for example, child taken out of class, first aid)

Name and position of the person this record was handed to:

Date and time the above person received this record:

If this record has been handed to anyone other than a member of the Safeguarding Team please explain why.

If you have used additional sheets to complete this record of concern please staple them to this form and write the number of additional sheets here.

Hand this form to a member of the Safeguarding Team before you go home.

NB: If you do not have certain information, such as the child or family's ethnicity, do not delay handing in the form.



HAMPTON COURT HOUSE

FORTITER IN RE SUAVITER IN MODO

Appendix 4 – Allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors/proprietor where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

1. Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
2. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
3. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
4. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
5. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
6. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
7. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
8. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
9. Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
10. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform DfE of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the governing board will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week

If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation;
- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that was deemed false, unsubstantiated or malicious, or any history of allegations where all such allegations have been deemed false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.