



ST PHILIP'S SCHOOL

## CHILD PROTECTION AND SAFEGUARDING POLICY

Author/reviewer responsible:	SMT	Last amended:	Sept 2024
Reviewed by:	SMT	Date of authorisation:	Nov 2024
Authorisation by resolution of:	Governors	Date of next review:	Sep 2025

### INTRODUCTION

This policy applies to the whole school, including EYFS, and is available to staff on Sharepoint and to the public on the school's website. It is also available in hard copy on request.

### Definition of safeguarding

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

### Safeguarding at St Philip's

St Philip's (the School) is committed to safeguarding the children in its care and complying at all times with the statutory framework. This Safeguarding and Child Protection policy will be reviewed annually by the Governors, and in addition whenever new legislation or guidance makes earlier review necessary. This policy, which will be authorised by the Governors, applies to all staff and volunteers, and is available to parents via the School website or in hard copy, upon request. In line with [guidance](#) from the Department for Education, the policy applies to all staff and volunteers whenever or wherever they are working with boys of the School, and all staff and volunteers receive a copy of the policy in line with child protection training before commencing work at the School.

### Statutory and non-statutory guidance framework

This policy has regard to the following statutory and non-statutory guidance:

- [Keeping Children Safe in Education](#) (September 2024) (KCSIE)
- KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006](#) (February 2015);
- KCSIE also refers to the non-statutory advice for practitioners, [What to do if you're worried a child is being abused](#) (March 2015);
- [Working Together to Safeguard Children](#) (March 2015, updated December 2023);
- WT refers to the non-statutory advice, [Information sharing](#) (March 2015, updated May 2024);

- [Children missing in education](#) (August 2024)
- [Prevent Duty Guidance: for England and Wales](#) (March 2015, updated April 2019);
- [The Prevent duty: Departmental advice for schools and childminders](#) (September 2023) (Prevent);
- [The use of social media for on-line radicalisation](#) (July 2015);
- [Education \(Independent Schools Standards\) Regulations \(England\)](#) (December 2014).

### **Scope of this policy**

It is not possible for this policy to cover every eventuality provided for in legislation or government guidelines. In addition to this policy, the School will have regard to the above statutory and non-statutory guidance when considering any safeguarding matter.

### **Range of this policy**

This policy covers the following safeguarding and child protection duties:

- the School's policy and procedures for dealing with concerns about a handling allegations child, in accordance with locally agreed inter-agency procedures;
- the School's arrangement for of abuse against members of staff, volunteers and the Head Master;
- the School's Staff Behaviour Policy;
- whistleblowing procedures;
- the School's safer recruitment procedures;
- the School's management of safeguarding and the Designated Safeguarding Lead (DSL);
- the training of the DSL, staff, relevant Governors, volunteers and the Head Master;
- arrangements for reviewing the School's policies and procedures annually;
- the School's arrangements to fulfil other safeguarding and welfare responsibilities.

## **CONCERNS ABOUT A CHILD**

### **The School's Local Safeguarding Child Board and LADO**

Although within the district of the Royal Borough of Kensington & Chelsea, the School comes under the tri-borough Local Safeguarding Children Partnership (LSCP) for [Kensington & Chelsea and Westminster](#). This hyperlink leads to the LSCP's procedures.

#### **Aqualma Daniel**

Safer Organisation Manager and Local Authority Designated Officer (LADO)

Mobile: 07870 481 712

Email: [aqualma.daniel@rbkc.gov.uk](mailto:aqualma.daniel@rbkc.gov.uk)

Where a concern involves an adult working with children the LADO should be informed. Where a concern involves another adult (e.g. family member or friend), a referral should be made to the social services local to the child's home address.

Kensington and Chelsea  
020 7361 3013 (office hours)

020 7373 2227 (out of office hours)  
[socialservices@rbkc.gov.uk](mailto:socialservices@rbkc.gov.uk)

Westminster  
Telephone: 020 7641 4000  
Out of hours: 020 7641 6000

Hammersmith and Fulham  
Telephone: 020 8753 5392  
Out of hours: 020 8748 8588

Wandsworth  
Telephone: 020 8871 6622  
Out of hours: 020 8871 6000.  
Email: [mash@wandsworth.gov.uk](mailto:mash@wandsworth.gov.uk)

Non-emergency DfE advice 020 7340 7264  
[counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

The NSPCC whistleblowing helpline can be contacted on:  
Weston House  
42 Curtain Road  
London  
EC2A 3NH  
Tel: 0800 028 0285  
Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **The Designated Safeguarding Lead (DSL)**

The School's DSL is Cecilia Bidie (Deputy Head Pastoral)  
**Email** [c.bidie@stpschool.co.uk](mailto:c.bidie@stpschool.co.uk) **Tel** 07855 118344

The Deputy DSL is Phil Whittock (Director of Extra-Curricular)  
**Email** [p.whittock@stpschool.co.uk](mailto:p.whittock@stpschool.co.uk) **Tel** 07768 395352

The Deputy DSL is Emily Forman (EYFS Lead)  
**Email** [e.forman@stpschool.co.uk](mailto:e.forman@stpschool.co.uk) **Tel** 07801 275899

### **The School and the LSCB**

The School's DSL has direct responsibility for making a referral to the LSCB. However, any employee or volunteer at the School may make a referral, if necessary. Indeed, every employee and volunteer has a responsibility to ensure timely action is taken to ensure proper safeguarding of children. This includes recognising, acting on and referring the early signs of abuse, neglect, and exploitation, keeping clear records, listening to what the child says, reassessing concerns if situations do not improve, sharing information quickly and challenging inaction.

### **The governor with safeguarding oversight**

The School's governor with safeguarding oversight meets termly with the DSL and, as part of their regular reviews of safeguarding initiatives at the school, is kept apprised of any interactions with the LSCB. The governor with safeguarding oversight at St Philip's is Colm O Siochru.

## **Understanding the signs and forms of abuse and taking action**

As part of their annual safeguarding training, all employees of the School have read [Part 1 of KCSIE](#) and are therefore acquainted with the signs and forms of abuse, neglect, and exploitation. Domestic abuse can be psychological, physical, sexual, financial or emotional. Children may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships. All of the above can have a detrimental and long-term impact on their health, well-being, development, and ability to learn (see NSPCC signs and symptoms, below).

This enables them to identify any cases of abuse or neglect and/or exploitation and refer their finding to the DSL, or, if necessary, to contact the LADO or, in an emergency, the police (by dialling 999). Employees are also apprised of *What to do if you're worried a child is being abused*. The types of abuse and neglect are described in KCSIE (pages 10 to 12) as follows.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may

involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

## **Signs and symptoms of abuse and neglect**

The NSPCC have identified the following signs and symptoms of child abuse and neglect.<sup>1</sup>

Signs and symptoms of abuse (5-11 years):

- becomes secretive and reluctant to share information;
- reluctant to go home after school;
- unable to bring friends home or reluctant for professionals to visit the family home;
- poor school attendance and punctuality, or late being picked up;
- parents show little interest in child's performance and behaviour at school;
- parents are dismissive and non-responsive to professional concerns;
- is reluctant to get changed for sports etc.;
- wets or soils the bed.

Signs and symptoms of abuse (11-16 years):

- drinks alcohol regularly from an early age;
- is concerned for younger siblings without explaining why;
- becomes secretive and reluctant to share information;
- talks of running away;
- shows challenging/disruptive behaviour at school;
- is reluctant to get changed for sports etc.

## **Female genital mutilation (FGM)**

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<sup>1</sup>This list is taken from the NSPCC [website](#).

Despite only having male pupils, staff are obliged to be aware of the signs and symptoms of FGM. These include girls:<sup>2</sup>

- from families less integrated into British society;
- born to a mother who has been subjected to FGM;
- who have a sister(s) who has undergone FGM;
- who are withdrawn from PSHE;

Girls from communities that practise FGM may be at particular risk:

- when new-born;
- during childhood (especially between the ages of 5-8) or adolescence;
- during school holidays when the family returns to its country of origin;
- when a female family elder is visiting from a country of origin;
- at marriage;
- during the first pregnancy.

Teachers should be alert to:

- conversations between girls about FGM (including in native languages);
- an attempt to disclose to a teacher impending FGM;
- uneasiness about the topic of FGM from parents or girls.

FGM may already have taken place if a girl:

- has difficulty walking, sitting or standing, or looks uncomfortable;
- spends longer in the bathroom or toilet;
- suffers frequent urinary, menstrual or stomach problems;
- is repeatedly absent or absent for a prolonged period followed by a change of behaviour;
- is unwilling to undergo a medical examination.

If any governor, member of staff or volunteer has a concern about FGM they should follow the School's referral process (see the table on p 18).

### **Specific safeguarding issues and statutory framework and guidance**

In addition to the five categories of abuse listed above on pages 3 and 4 (Abuse, Physical abuse, Emotional abuse, Sexual abuse, Neglect), there are a number of specific safeguarding issues specified in KCSIE. Below is the list of issues that could arise at the School, with the relevant guidance alongside each issue.

- Child sexual exploitation  
[\*What to do if you suspect a child is being sexually exploited\*](#)
- Bullying including cyberbullying  
[\*Preventing and tackling bullying\*](#)  
[\*Supporting children and young people who are bullied: advice for schools\*](#)  
[\*Cyber bullying: advice for headteachers and school staff\*](#)  
[\*Advice for parents and carers on cyber bullying\*](#)
- Domestic violence

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<sup>2</sup>These signs are taken from [Multi-agency practice guidelines: female genital mutilation](#) (Home Office, 2014 updated July 2020).

[Domestic violence and abuse](#)

- Drugs  
[DfE and ACPO drug advice for schools](#)
- Fabricated or induced illness  
[Safeguarding children in whom illness is fabricated or induced](#)
- Faith abuse  
[National action plan to tackle child abuse linked to faith or belief](#)  
[National action plan to tackle child abuse linked to faith or belief: executive summary](#)
- Forced marriage  
[Guidance on forced marriage](#)
- Gangs and youth violence  
[Preventing youth violence and gang involvement: practical advice for schools and colleges](#)
- Mental health  
[No health without mental health](#)
- Private fostering  
[Children Act 1989: private fostering](#)
- Preventing radicalisation  
[Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism](#)  
[Prevent Duty Guidance: Guidance for specified authorities in England and Wales on the duty of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism](#)  
[The Prevent Duty: departmental advice for schools and childcare providers](#)
- Sexting  
[Police internet safety site](#)
- Trafficking  
[Safeguarding children who may have been trafficked: practice guidance](#)
- Serious Violence  
<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

**Preventing the process of a person becoming a terrorist or supporting terrorism and/or legitimising support for, or use of, terrorist violence**

Under the Counter-Terrorism and Security Act, 2015, the School has a duty to prevent people from becoming terrorists or supporting terrorism. Staff must be ‘able to identify children who may be vulnerable to legitimising support for, or use of, terrorist violence, and know what to do when they are identified.’<sup>3</sup> Legitimising support for, or use of, terrorist violence suggests adherence to extremist views, which are defined as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.’<sup>4</sup> A particular awareness should be shown to the dangers of radicalisation through social media such as YouTube, Facebook, Tik-Tok etc.

If a member of staff has a concern about a boy adopting extremist views or legitimising support for, or use of, terrorist violence, he or she should immediately report the concern to the DSL as

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<sup>3</sup>[Prevent](#), 5.

<sup>4</sup>Ibid.

he or she would do with any other safeguarding concern. The DSL will assess the level of risk that the boy poses to the school and wider community and initiate adequate procedures. The DSL will also decide the best level of communication with the relevant parents.

Where there are concerns or evidence that a child, young person and/or their parents may hold extremist views or are at risk of legitimising support for, or use of, terrorist violence, cases should be reported to external agencies.

Hammersmith & Fulham and Kensington and Chelsea Bi-Borough Prevent team

**Email** [prevent@lbhf.gov.uk](mailto:prevent@lbhf.gov.uk) **Tel** 020 8753 5727

Belgravia Police Station (Metropolitan Police Service)

**Tel** 101 (non-emergency number)

DfE mailbox/ helpline

**Email** [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk) **Tel** 020 7340 7264

As with all referrals, in normal circumstances concerns will be handled by the DSL; however, any member of staff may contact the above agencies if necessary. If a member of staff contacts the LADO directly, they should inform the DSL as soon as possible thereafter. As with all safeguarding concerns, staff must provide timely action, keep clear records, listen to the boy, reassess the situation when situations do not improve, share information and challenge inaction.

The DSL should keep written records of all concerns, discussions and decisions, including the rationale for those decisions.

## **Channel**

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to legitimising support for, or use of, terrorist violence. Any concerns can be discussed with the Head Master and staff can find further information online from the Home Office at <https://www.gov.uk/government/publications/channel-guidance> (updated December 2023).

## **The right course of action: cases of significant harm and cases where support is needed**

The School will respond to safeguarding concerns according to the situation. If there is reason to believe that a child has suffered significant harm then a referral to the LADO, social services or, in an emergency, the police will be made immediately. If there is evidence that significant harm has not been suffered but a child would benefit from additional support, then, in consultation with the LADO, an inter-agency assessment will be made, in the form of a 'Common Assessment Framework' (CAF) or 'Team around the Child' (TAC) strategy. Parental permission is not required for the School to initiate this action. This procedure also applies in the case of serious harm being caused to a pupil by another pupil(s), in which case the perpetrator would also be treated as being 'at risk'.



If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns that have been addressed and, most importantly, that the child's situation improves.

### **Allegations of abuse made against other children (child-on-child abuse)**

Staff should recognise that children are capable of abusing their peers. There may be cases where abuse is inflicted – or where there is a risk of abuse – by one or more pupils on another pupil. Such 'child-on-child' abuse can manifest itself in several ways, such as:

- physical abuse
- emotional abuse
- sexual abuse (including consensual and non-consensual sharing of nude and semi nude images and/or videos also known as 'sexting')
- sexual harassment
- 'upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- initiation and hazing type violence and rituals used as a way of initiating a person into a group.

A child's behaviour may be regarded as abusive if there is a large difference in power between the young people concerned; the perpetrator has repeatedly tried to harm one or more other children; there are concerns about the intention of the alleged perpetrator; there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

An allegation will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm. All children involved whether victim or perpetrator will be treated as "at risk" and supported.

All staff understand, that even if there are no reports in the school it does not mean peer-on-peer abuse is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding peer-on-peer abuse they must speak to the DSL or deputy DSL immediately.

The DSL will investigate any concerns without delay. It is important to note that serious concerns can never be passed off as 'banter', 'a part of growing up' or 'a right of passage', and will be dealt with using the School's Anti-Bullying Policy. The School has a zero-tolerance approach to peer-on-peer abuse.

Staff are aware of the importance of challenging inappropriate physical behaviour as dismissing or tolerating such behaviour risks normalising them.

The School will be attentive to cases where the legal threshold has been passed. Where there is a risk or actual occurrence of serious misconduct – such as where serious bodily harm has occurred – the School will be obliged to inform the police. Similarly, where the School is seriously concerned for the wellbeing of a boy – whether the victim or perpetrator of bullying – it will be necessary for the DSL to contact outside agencies.

The School has a zero-tolerance approach to any form of sexual violence and sexual harassment; it is never acceptable and will not be tolerated. Sexual violence and sexual harassment can occur between children or groups of children of any age and sex. It can also occur online. Staff should be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and that it is more likely to be perpetrated by boys. However, all reports must be treated seriously.

Pupils are made aware that they can and should report any form of abuse. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim must never be given the impression that they are creating a problem by reporting a form of abuse. Nor should a victim ever be made to feel ashamed for making a report.

The School is committed to creating a culture where peer-on-peer abuse is unacceptable. Assemblies, form time and PSHE lessons are used to frequently discuss relationships and treating each other with kindness and respect.

### **Guidance to staff on receiving a disclosure**

The School promotes a culture of safeguarding in which every employee and volunteer feels able, and knows how, to receive and act upon a concern or a disclosure. It is important that staff know that if a child asks to speak to them they should listen to what they have to say, and not tell them to speak to another member of staff, e.g. the DSL. Any member of staff can receive a disclosure and must then refer the matter to the relevant person (see the next section, 'Arrangements for dealing with allegations of abuse against teachers and other staff').

Staff are given the following guidance for dealing with a disclosure if from a pupil:

- provide a safe and reassuring environment for the boy to make the disclosure, while not promising confidentiality;
- listen to the disclosure without expressing any personal opinions (such as expressing horror or disbelief);
- if questions are needed, then ask open questions (e.g. 'what happened?') rather than leading questions (e.g. 'does he kick you often?');
- do not photograph any visible injuries or ask the boy to remove any clothing in order to inspect injuries he refers to in his disclosure;
- explain that the information will be passed on to the DSL or, in their absence, the Deputy DSL (or another member of the SMT);
- do not take notes during the disclosure, but make a factual, contemporaneous note immediately after the disclosure, using exact phrases, names, dates and times wherever possible, noting and describing any visible injuries; sign and date the disclosure, or send it to yourself via email.
- All concerns discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the designated safeguarding lead.

### **Children missing in education**

The School enters pupils on the admission register at the beginning of the first day of school (or when the School has been notified that the pupil will attend the school). If the pupil fails to attend on the agreed or notified date, the school will undertake reasonable enquiries to establish the whereabouts of the pupil and consider notifying the local authority at the earliest opportunity.

A register is taken at the school twice a day; once in the morning and once in the afternoon. Staff (particularly form tutors and office staff) assist in monitoring pupil attendance and report issues of irregular attendance or extended absence to the DSL. The DSL will then seek to obtain information regarding the pupil's absence and will inform the local authorities of the details of pupils who fail to attend regularly or have missed ten school days or more without permission (including not returning to school after an authorised absence).

## **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF**

In [KCSIE](#), the government has issued statutory guidance for schools, local authorities and police to follow when a potential child protection allegation is made against an employee, governor or volunteer at the School.

### **Knowing whom to make the referral to**

Any member of staff may receive a disclosure, allegation or concern, and staff are trained to know who to then refer the disclosure to. All such concerns will be taken seriously. It should be noted that, as any member of staff can receive a disclosure, so any member of staff can contact the LADO<sup>5</sup> if deemed necessary, or, in an emergency, the police. However, in normal circumstances staff will adhere to the following procedure. In the case of an allegation made against a member of staff (other than the Head and DSL), both the Head and DSL should be notified. The various situations are explained in the diagram on page 18.

### **Aim of the School's procedures**

The School aims to effectively manage situations where allegations are made against an individual who may pose a risk of harm if continuing to work with children in their present position or another capacity. The member of staff or volunteer may be alleged to have:

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

This procedure also applies where the abuse did not occur at School. Allegations against a teacher who is no longer teaching, and all historical allegations, will be referred to the police.

### **Duty of care to employees**

The School has a duty of care to its employees. The School will provide effective support to any member of staff facing an allegation. In the case of suspension, the member of staff will be given a named contact/mentor and advised to contact their professional association or other organisation for support.<sup>6</sup> The mentor will inform them of the process of the case and other work-related issues. The person against whom the allegation has been made should not be prevented from social contact with colleagues unless there is evidence that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Any allegation will be dealt with in a quick, fair and consistent manner that is in the best interests of the child and the person against whom the allegation is made.

### **The School's complaints procedure**

Parents may request a hard copy of the School's formal Complaints Procedure from the School Office.

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<sup>5</sup>See above for contact details, p 2.

<sup>6</sup>[KCSIE](#), paragraph 369

## **Timescales**

KCSIE states that: 'It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.' During term time, the School aims to keep to the following timescales. Unsubstantiated or malicious allegations should be resolved within one week. Allegations that do not require formal disciplinary action should be resolved within three working days. Disciplinary hearings should be held within 15 days.

## **Contact with the LADO once a disclosure has been made**

Once a disclosure against anyone working at the School has been made, the School will consider whether the allegation should be reported to the LADO. Only after notifying and consulting with the LADO (or, in the most serious cases, the police) will the School undertake an investigation.

## **Initial considerations**

- **Local/ internal process**

The School will judge carefully how serious the allegation is; not all allegations will warrant a police investigation or enquiries by the LADO. In such cases, the School will be able to resolve the case without delay. If the case is thought to be borderline, then the School should still contact the LADO and discuss the matter informally. The DSL will discuss the nature, content and context of the allegation with the LADO, as well as what information should be shared with the parents and whether the person about whom the allegation concerns should be suspended. The LADO will also advise whether the police should be informed. Written records (e.g. a follow-up email) will be kept.

- **External process**

Where allegations are serious, the School will involve the LADO and/or the police. Whoever has received the allegation should fully brief the DSL who will contact the external authorities (though anyone can make a referral). The DSL will discuss the nature, content and context of the allegation with the LADO, as well as what information should be shared with the parents and whether the person about whom the allegation concerns should be suspended. The LADO will also advise whether the police should be informed. Written records (e.g. a follow-up email) will be kept.

## **Low level concerns**

A low level concern about the behaviour of a member of staff is one where such behaviour does not meet the 'harms threshold' and yet appears to be inconsistent with the staff code of conduct or professional boundaries.

It is crucial that any such concerns should be shared. This will maintain an open and transparent culture within the school, reinforcing its ethos and values; ensure that adults working in the School act within professional boundaries; and enable concerning, problematic or inappropriate behaviour to be identified and addressed early, minimising the risk of abuse.

Low level concerns about a member of staff should be reported as set out in the diagram on page 2 – click [here](#).

Staff are also encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised the School's expected professional standards. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

The Head Master will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.

The Head Master must record all low level concerns in writing, including details of:

- the concern;
- the context of the report;
- the name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- action taken and the rationale for this.

Records of low level concerns must be reviewed periodically in order to identify any patterns of concerning, problematic or inappropriate behaviour. Should a pattern of behaviour be identified, the school will decide on a course of action depending on the nature of the concerns. This will include referral to the LADO if the harms threshold is met. The review of records will also consider whether these indicate any wider cultural issues in the school which should be addressed by revising school policies or providing further training.

Further guidance on low level concerns can be found in Keeping Children Safe in Education part 4.

### **Categories of outcome**

In judging the outcome of allegation investigations, the School will use the following terminology.

- 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. The term, therefore, does not imply guilt or innocence.

### **Initial steps<sup>7</sup>**

In circumstances where the allegation concerns the Head Master or DSL, the procedure illustrated in the table on page 18 of this policy should be followed. Therefore, if the Head Master

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<sup>7</sup>[KCSIE](#), paragraph 342.

is the subject of allegation then in the following policy please substitute 'Chair of Governors'. Similarly, if the DSL is the subject of the allegation then in the following policy 'Deputy DSL' should be substituted.

On receipt of the allegation, the Head Master (the 'case manager') will immediately discuss the allegation with the DSL (the 'designated officer'). This discussion will establish the nature, content and context of the allegation and agree a course of action. The DSL may wish to ascertain further details to form a satisfactory judgement. Alternatively, the decision may be made to contact the LADO and/or the police immediately.

If the allegation concerns an adult who works or volunteers for a third party organisation, the DSL should be informed. The DSL will liaise with the third party organisation's safeguarding representative and the LADO.

### **If no further action is deemed necessary<sup>8</sup>**

Where a decision is made that no further action is deemed necessary, the Head Master and DSL should both make a record of why they reached this judgement. They will also discuss what information should be put in writing and communicated to the individual concerned. Then they will decide what action with regard to both parties, particularly where they may come into contact with one another. The Head Master will consider appointing mentor(s) for one or both parties in the short term.

### **Informing the accused party<sup>9</sup>**

Where a decision has been made by the Head Master and DSL that external agencies do not need to be contacted, the Head Master will inform the accused person of the details of the allegation. However, where the case is more complicated or serious and a strategy discussion is needed, the Head Master should delay this conversation until guidance has been received from the LADO and/or the police.

### **Suspension**

In exercising his duty of care both to children and employee, the Head Master will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the School or whether alternative arrangement can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step. The School should consider the impact on the person if they are subsequently reinstated.

### **Where a child is suffering or is likely to suffer significant harm**

Where there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#) (particularly on making an assessment, pages 17-51). If the allegation is about physical contact, the discussion should take into account that teachers and other School staff are entitled to use reasonable force to control or restrain children in certain circumstances.

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<sup>8</sup>[KCSIE](#), paragraph 351.

<sup>9</sup>[KCSIE](#), paragraph 351.

## **Deciding on an outcome**

When an outcome has been decided, the Head Master and DSL should discuss – with the The for safeguarding – the next steps available. Next steps may include:

- Taking no further action.
- In relation to contractors, consultants, a decision not to use the person’s services in future.
- In relation to employees, taking action pursuant to the School’s disciplinary procedure.

Where the best course of action is unclear, the School may seek guidance from the LCSP.

## **Police and local authority investigations**

Where the police or local authority carry out an investigation, the School will ask them to obtain consent from the individuals involved to share their statements and evidence for use in the School’s disciplinary process. This will enable the School to take appropriate action promptly after the conclusion of the police and/or local authority investigation/court case.

## **Non-cooperation from the accused**

Where the accused person’s period of notice expires or where he/she refuses to cooperate, the School must nevertheless reach a conclusion in the investigation.<sup>10</sup>

## **Confidentiality – parents**

The parents of carers of a child or children involved in the allegation should be told about it as soon as possible if they do not already know of it. However, if a strategy discussion is required, or police or local authority agencies need to be involved, then parents should be informed after those agencies have been consulted. As the case proceeds, parents should be kept informed of its progress. Any disciplinary hearing will be confidential, though the parents or carers should be told the outcome in confidence.

Parents should be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing.<sup>11</sup>

## **Confidentiality – publicity**

Once the LADO has been fully informed of the disclosure/allegation, the School should do what it can to maintain confidentiality and guard against unwanted publicity. This is so as to avoid prejudicing any criminal proceedings, and applies until the person is charged with an offence or the DfE/NCTL publish information about an investigation or decision in a disciplinary case.

## **Protecting the identity of the accused**

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<sup>11</sup>See further [KCSIE](#), paragraph 375-380. This is set out in section 141F of the Education Act 2002 (paragraph 125).



The School has a legal obligation to ‘maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.’<sup>12</sup> Exceptions to this are: where the Secretary of State publishes information about an investigation; where the accused effectively waives their right to anonymity by going public or giving their written consent for another to do so; or where a judge lifts restrictions. Any publication, including on social media, of information that could lead to the identification of the accused by the public, is in breach of the law.

The Head Master will take advice from the DSL, police and LADO to decide:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation;
- how to manage press interest if and when it should arise.

### **Criminal proceedings**

Following the conclusion of a criminal investigation, the School will consult with the LADO to decide whether any further action, including disciplinary action, is appropriate, and if so, how to proceed. Any criminal conviction for harming children will preclude that person from working with children again.

### **Duty to make a referral**

Where there is evidence that anyone has harmed, or poses a risk of harm, to a child or vulnerable adult, there is a legal duty on the School to report that person to the Disclosure and Barring Service using [their guidance](#). The DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Referral to the DBS will also be made if the person resigns prior to an investigation being carried out or reaching its conclusion.

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. The School will not make any compromise/settlement agreement in the case of a person deemed unsuitable to work with children. Any such agreement which contained a condition of not referring the case to the DBS would constitute a criminal offence.<sup>13</sup> The School will also confirm to OFSTED inspectors that it has reported to the DBS all instances of action in relation to safeguarding concerns.

The School will also consider making a referral to the National College for Teaching and Leadership (NCTL), according to [their guidance](#).

### **Whistle Blowing**

Staff should bring matters of concern to the attention of Head Master or DSL and concerns can be reported directly to the LADO. Once you have shared your concerns you should submit them in writing giving names, date and places where appropriate. No action will be taken against you

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<sup>12</sup>[KCSIE](#), paragraph 375.

<sup>13</sup>[KCSIE](#), paragraphs 396.

if the concern proves to be unfounded but was raised in good faith. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Include concern raised and not acted upon by the safeguarding leads.

Allegations that are made frivolously, maliciously or for personal gain will lead to disciplinary.

### **Unsubstantiated, false or malicious allegations<sup>14</sup>**

Where an allegation by a pupil is shown to be baseless, the Head Master will consider whether to take disciplinary action in accordance with the School's Behaviour Policy.

Where a parent has made a deliberately baseless allegation, the Head Master will consider whether to require that parent to withdraw their child or children from the School.

The School reserves the right to contact the police in the case of malicious allegations against staff.

Details of all allegations found to be malicious will be removed from personnel records.<sup>15</sup>

### **Record keeping**

Except where allegations are found to be malicious, full records must be kept. Where a resolution was reached, a clear and comprehensive summary of any allegations against the member of staff, and all other associated records, including the outcome of the investigation, will be retained on the person's confidential personnel file. This record will be kept until the accused has reached retirement age or for a period of 10 years if that is longer. Where a resolution was not found, records will be kept for 75 years. This will enable clarification of any future DBS checks where allegations did not result in a criminal conviction, or if a historical allegation is made.

The School will provide details of substantiated allegations in future references.

### **Review – learning lessons**

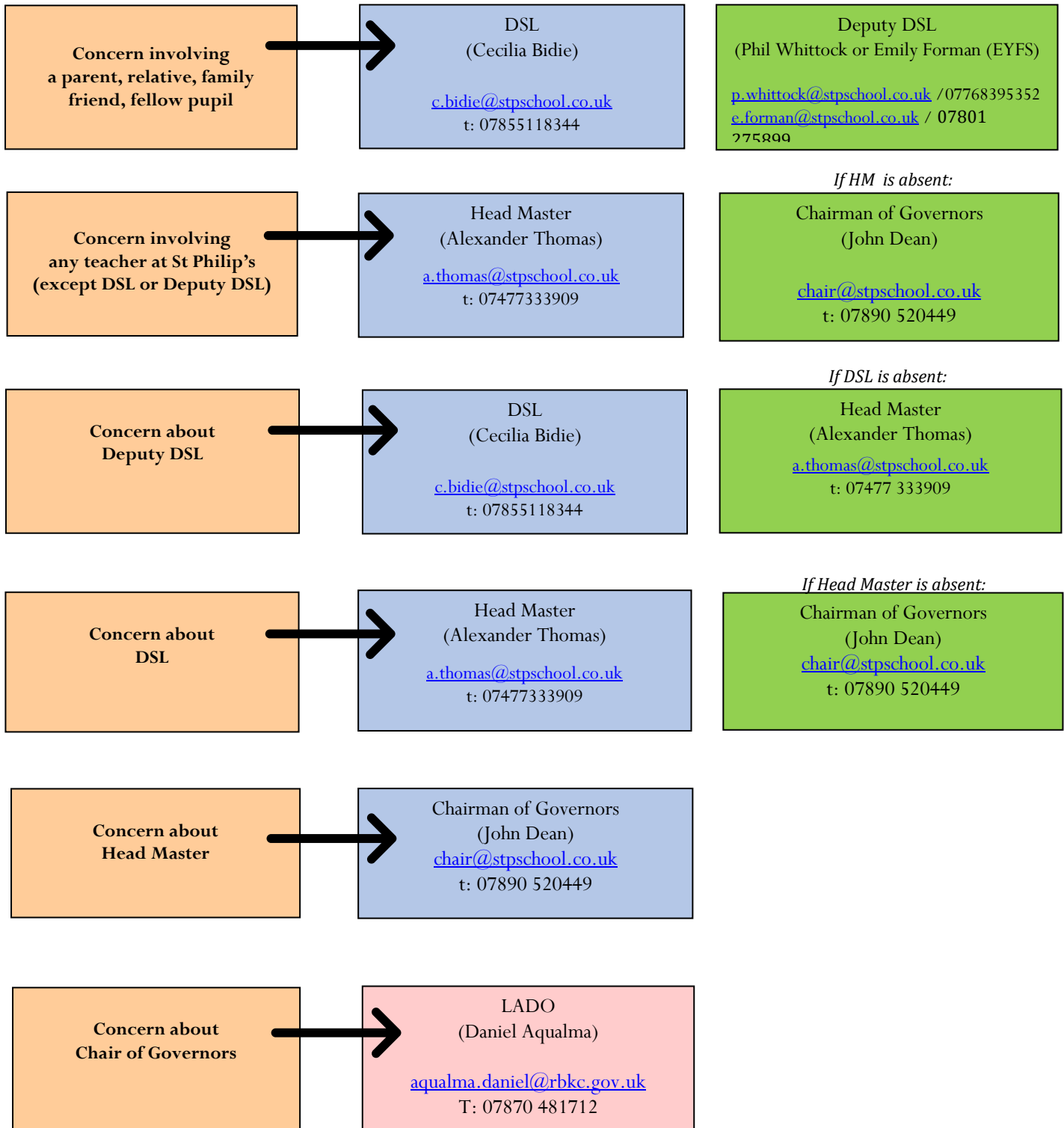
Where an investigation has occurred, the DSL will immediately review the School's safeguarding procedures and prepare a report for the Governors' Pastoral Committee. Where a substantiated allegation has been found, the DSL should consult with the LADO on the efficacy of the School's procedures or practice (including any disciplinary action taken), to ensure the best possible future safeguarding of children.

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<sup>14</sup>[KCSIE](#), paragraph 397.

<sup>15</sup>[KCSIE](#), paragraph 397.

**TO WHOM TO REPORT IN CASE OF A DISCLOSURE/CONCERN**



## 1. SAFER RECRUITMENT

Safer recruitment of staff is a vital part of creating and ensuring the safety of children at the School. The School's procedures have regard to Part 3 ('Safer recruitment') of [Keeping Children Safe in Education](#) (September 2020) and the [Education \(Independent Schools Standards\) Regulations \(England\)](#) (December 2014).

The aims of the School's safer recruitment procedures are as follows:

- to ensure a culture of safe recruitment;
- to adopt recruitment procedures that help deter, reject or identify people who might abuse children;
- that the School's recruitment process complies with government legislation and guidance, in particular KCSIE, and guidance issued by the DBS;
- that the School meets safeguarding requirements, in particular by carrying out the required pre-employment checks.

And further that:

- staff are appointed on the basis of merit, ability and suitability for the role advertised;
- all applicants are considered equally and consistently;
- applicants face no unjust or illegal discrimination;

### **Safer recruitment training**

Although it is not a legal requirement in the independent sector to have one person on every recruitment panel trained in 'safer recruitment', at the School the Head Master has received this training.

### **Retention of records**

The School will make copies of all relevant documentation submitted in the application and recruitment process. The School follows government [rules on data protection](#). Documents of successful candidates will be kept for the duration of their employment and for six months thereafter; unsuccessful candidates' documentation will be securely destroyed after six months.

### **Recruitment and selection procedure**

Part 3 of the [Education \(Independent School Standards\) Regulations \(2014\)](#) establishes the checks that the School must make before employment may commence. Safe recruitment consists of 'criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information.'

## **PERMANENT STAFF**

### **Application process**

- Via [www.tes.co.uk](http://www.tes.co.uk) or upon request from the School, candidates receive an application pack comprising of a job description, person specification and application form.
- The application form (see Appendix 1) requires the following information: personal details, education and employment history, disability or special provision required, referees and a criminal conviction declaration, including disqualification by association.
- The application form also explains the safeguarding checks that the School will undertake on any successful applicants and directs candidates to the School's safeguarding and child

protection policy on the School website (or available in hard copy from the office), and that successful applicants will be required to demonstrate their right to work in the UK.

- A CV is not requested and may not be submitted in place of a completed application form, though candidates may submit a CV in addition to their application form, should they so wish.
- Candidates are then shortlisted by the Head Master, in consultation with SMT, and invited to interview. As part of the shortlisting process, the schools and colleges may carry out an online search as part of the due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview

### **Referees**

The School requires two references, of which one must be the current/most recent employer (i.e. school if the applicant is a teacher). Shortlisted candidates who agree to come to interview will have references taken in advance of interview so that any issues can be addressed with the candidate at interview. Reference request forms include the following question: *Are there any reasons why the candidate should not have access to children? Please include any allegations or concerns that have been raised about the applicant that relate to the safety and welfare of children, and the outcome of these concerns. Please include all disciplinary offences related to children, even if 'time expired'.*

The two references must be submitted to the School in writing. Notes from any further details provided over the telephone will be recorded on the applicant's file.

On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate: for example if the answers are vague. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies should be taken up with the candidate.

Any information about past disciplinary action or allegations will be considered carefully when assessing the applicant's suitability for the post.

### **Interview**

At interview, the panel will consist of at least one person certified in safer recruitment, who will ask the candidate some questions about safeguarding children, as well as other questions on the suitability of the candidate for the post defined in the job description and person specification.

### **Checks on identity, qualifications and right to work in the UK**

While at the School for interview, candidates will be required to verify their identity. The identity check will be made against an official document that includes photographic identity (i.e. a passport or driving licence). A second form of identity should confirm the address of the applicant (e.g. a utility bill, bank statement or similar). Candidates should also bring original certificates of any educational and professional qualifications cited in their application or requested by the School.

Finally, the School follows the Home Office guidance on checking a job applicant's [right-to-work documents](#). Any UK citizen has the right to work in the UK. Non-UK citizens must show genuine, original and unchanged documents belonging to them. These may be a passport, work

visa or Certificate of Entitlement to the right of abode in the UK. Copies will be kept by the School according to its policy on retention of records.

### **Letters of appointment, acceptance and contract**

The successful candidate(s) will receive a letter of appointment which stipulates the particulars of the job offer, a contract incorporating the School's standard terms, and conditions of employment and the expected starting date subject to and conditional on the submission of a medical questionnaire and further satisfactory completion of safeguarding checks by outside agencies.

### **DBS checks and barred list information**

All successful candidates must receive clearance at the enhanced level from the DBS before commencing employment at the School. If they are in regulated activity, then the enhanced check must include barred list clearance. 'For all other staff who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.'

The candidate receives from the DBS their certificate which must be presented to the School as soon as possible after receipt and prior to taking up the post.

### **Commencement of employment pending a DBS disclosure**

If there is a delay in receiving a DBS disclosure, the Head Master may, under strict controls, allow the person to begin work pending its receipt. In such a case, the School will check the Children's Barred List and any other available checks, such as identity and references, and establish appropriate supervision and a risk assessment (see Appendix 4).

### **Recruitment of ex-offenders**

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All previous convictions (including those considered 'spent') must be disclosed to the School. Failure to do so may result in summary dismissal on the grounds of gross misconduct, and may also constitute a criminal offence.

If a DBS check identifies a criminal record, the Head Master will make a judgement about the candidate's suitability, taking into account only those offences which may be relevant to the particular job or situation in question, the nature of the appointment, the age of the offence and its frequency. The Head Master will confirm in writing whether the person can be employed and, if so, any mitigating actions and controls to be put in place.

It is unlawful for the School to employ anyone who is barred from working with children. As it is similarly unlawful for such a person to apply for a position within a School, the School will make a report to the police if:

- it receives an application from a barred person;
- it is provided with false information in, or in support of an applicant's application;
- it has serious concerns about an applicant's suitability to work with children.

If an applicant wishes to dispute any information contained in a disclosure, the applicant can do so by contacting the DBS direct.

### **Prohibition from teaching**

Anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. Prohibition checks are made through the [Teacher Regulation Agency](#) through which checks can be made against teachers with QTS that shows any restrictions, prohibition orders, or failure to complete induction or probation year.

### **Prohibition from management ('section 128 directions')**

Staff appointed to management positions must not be subject to a section 128 direction prohibiting them from managerial positions in an independent school. This applies to appointments from August 2015 and does not apply to internal promotions. This check is made via the government website: [Individuals prohibited from managing or governing schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### **Overseas checks, if appropriate**

If the applicant has spent a significant time abroad – this is generally considered three months, though there is no prescribed time – the DBS may be insufficient. Unless this time relates to a period of time under the age of sixteen, the School will, in such cases, 'obtain whatever evidence of checking is available from the person's country of origin (or any other countries in which he or she has lived) and do this before the appointment is made.'

It is important that, even if a candidate has spent little or no time in the UK before, they still receive the DBS vetting.

### **Declaration of medical fitness**

Upon receiving an offer of employment, prospective employees must complete a medical questionnaire (see Appendix 3). The School may legitimately ascertain that the candidate is physically able to carry out the role, and ask the applicant to sign that they 'know of no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibility required by the post in question.' The School may only ask questions that are related to an intrinsic function of the work. The School is bound to make reasonable adjustments for disabled people to be able to undertake employment.

### **Single Central Register of appointments**

The Head Master will ensure that the correct information is stored on the Single Central Register of appointments (hereafter SCR). The SCR records the following checks for all members of staff at the School:

- identity;
- Barred list/List 99 (date of DBS check unless a separate earlier barred list check was undertaken);
- professional qualifications;
- enhanced disclosure (or DBS Status Check);
- overseas checks, where applicable;
- right to work in the UK;
- prohibition from teaching check;
- prohibition from management check;
- completed application form;
- medical fitness declaration;
- self-declaration of non-disqualification by association.

In the case of older appointments, some evidence may not be available to support the production of a fully complete SCR. Where this is the case, the School will take steps to fill in as many gaps as possible.

The following table illustrates whether an individual requires inclusion in the SCR:



	Part 4 applies?	Included on the SCR?
Staff in regulated activity	Yes – paragraph 18	Yes
Staff not in regulated activity	Yes	Yes
Volunteer (unsupervised)	No*	If they are checked, the checks should be recorded on the SCR – paragraph 73 KCSIE.
Volunteer (supervised)	No*	If they are checked, the checks should be recorded on the SCR – paragraph 73 KCSIE.
Supply Staff	Yes – paragraph 19	Yes
Employees of third parties (visiting professionals)	No*	No
Contractor's staff	No*	No
Chair of proprietors/governors	Yes – paragraph 20	Yes
Other proprietor/governor	Yes – paragraph 20	Yes
Non-proprietor governor	No*	No
Adults who supervise children on work experience	No*	No
Host families	No*	Not if a "private arrangement" between families.

\* Those categories marked 'No' may still need vetting checks – as part of the school having regard to DfE safeguarding guidance, and schools may continue to include them on the SCR if they wish.

## **SUPPLY STAFF**

The School occasionally employs teaching, sports and non-teaching staff through supply agencies.

### **Confirmation of checks by supply agency**

The School must receive written notification (notification only, not copies of documentation) from the supply agency that it has made the relevant checks in accordance with paragraph 238 of [Keeping Children Safe in Education](#). Those checks are:

- identity;
- Barred list/List 99;
- qualifications;
- overseas checks, where applicable;
- right to work in the UK;
- prohibition from teaching;
- date of written notification that it or another agency has received an enhanced disclosure, and the date of the disclosure;
- whether the agency has supplied a copy of the enhanced criminal record certificate;
- date of written notification that it or another agency has received an enhanced disclosure, and the date of the disclosure;
- whether the agency has supplied a copy of the enhanced criminal record certificate, which must be less than three months old when the person starts work at the school (unless s/he has been working in a school in the last three months).

### **Identity check by School**

In addition to ascertaining that the supply agency has checked the identity of the person (see list above), the School makes its own check upon arrival.

### **Single Central Register**

For supply staff, the School will record the following on the SCR:

- identity checks on arrival;
- CV / application form, references;
- medical fitness declaration;
- disqualification from childcare.

## **CONTRACTORS**

The School will always check the identity of contractors and their staff on arrival at the School.

The checks required for contractors depend on whether they are occasional/temporary or long-term/permanent, and again whether the person is in regulated or non-regulated activity.

It should be noted that those on the school site when pupils are not present for example in the evenings or during School holidays, do not require vetting checks.

### **1. Occasional/ temporary contractors**

Where contractors are 'not involved in teaching/ training etc. or personal care', for example an emergency plumber, the School has the discretion in law to judge that the person is not in regulated activity and can therefore carry out their work. However, 'if their work gives them

opportunity for regular contact with children, KCSIE 2018 stipulates that an enhanced DBS check without barred list information will be required’.

Where checks are not carried out on occasional/temporary contractors, the School adheres to the following procedure:

- the risk assessment is filed and available to inspectors;
- the School explains to the contractor that he must not engage in regulated activity (i.e. Unsupervised contact with children);
- the contractor is supervised throughout his time at the School (‘schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances’).

## **2. Regular/ long-term contractors employed by a third party**

The School employs some regular/ long term contractors employed by a third party who are in regulated activity (i.e. may come into unsupervised contact with children). Examples of people in this category are tutors or after-school clubs providers. Such people need the same checks as School staff (see above, under the heading ‘Single Central Register of appointments’). However, these checks should be carried out by the employing organization, with verification by the School of these checks, with the information – including the number of the person’s enhanced DBS with barred list status – recorded on the SCR. The School will also check the person’s identity upon arrival (i.e. photographic identification such as a passport or driving licence) and obtain a copy of the person’s DBS certificate.

## **3. Regular/long-term contractors who are self-employed**

As self-employed contractors cannot vet themselves, the School requires them to be checked by their professional associations. If this is for some reason not feasible, the School will run checks for them (as outlined for School staff above, under the heading ‘Single Central Register of appointments’).

## **VOLUNTEERS**

Under no circumstances will a volunteer, in respect of whom no safeguarding checks have been undertaken, be left unsupervised with children or allowed to engage in regulated activity.

Prior to engaging a volunteer, the DSL will consider the proposed activities and what, if any, vetting checks are required, in line with the School’s policy and statutory law.

Volunteers who, on an unsupervised basis, teach or look after children regularly or provide personal care on a one-off basis in School will be in regulated activity and the School will obtain an enhanced DBS certificate including Barred List information.

## **GUEST SPEAKERS**

The School is conscious that the School’s safeguarding duty extends to the selection of guest speakers. Guest speakers should not be known to hold extremist views and should be supervised at all times while visiting the School.

## **GOVERNORS AND TRUSTEES**

Although the recruitment and vetting of Governors is outside the scope of this policy, all Governors and Trustees undergo enhanced DBS checks (without barred list checks). Governors and Trustees are never in regulated activity with pupils. All Governors and Trustees are checked against the section 128 direction list.

## 2. THE DESIGNATED SAFEGUARDING LEAD

The School's Designated Safeguarding Lead (DSL) is held by the Deputy Head Pastoral. The DSL is responsible for leading child protection in the School. The key responsibilities are outlined in [KCSIE](#), Annex B.

The School's DSL is Cecilia Bidie (Deputy Head Pastoral)

**Email** [c.bidie@stpschool.co.uk](mailto:c.bidie@stpschool.co.uk) **Tel** 07855 118344

The Deputy DSL is Phil Whittock (Director of Extra-Curricular)

**Email** [p.whittock@stpschool.co.uk](mailto:p.whittock@stpschool.co.uk) **Tel** 07768 395352

The Deputy DSL is Emily Forman (EYFS Lead)

**Email** [e.forman@stpschool.co.uk](mailto:e.forman@stpschool.co.uk) **Tel** 07801 275899

### Role of the DSL

The DSL is responsible for managing referrals, training and raising awareness relating to abuse, neglect and radicalisation.

### Managing referrals

The DSL will refer all cases of suspected abuse to the following:

- the LADO;
- other designated officers, such as the Deputy DSL/s and Head Master (where staff at the School are involved);
- the Disclosure and Barring Service (where a staff member is dismissed or leaves the School due to risk/ harm to a child);
- Police (where a crime may have been committed).

The DSL will liaise with the Head Master to inform him of issues, especially of ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

The DSL will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

### Training

The DSL and the Deputy DSLs will receive updated child protection training every two years in order to do the following:

- understand the assessment process in order to support children of all ages to improve a family's resilience and outcomes or reduce the chance of a problem getting worse
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understand the School's safeguarding and child protection policy and procedures, especially when inducting new and part time staff;
- be alert to the specific needs of children in need, those with SEN and young carers;
- be able to keep detailed, accurate, secure written records of concerns and referrals;
- obtain access to resources and attend any relevant or refresher training courses;

- encourage a culture of listening to children and taking account of their wishes and feelings.

The DSL and Deputy DSLs will complete the online Channel General Awareness module and receive available training from the local authorities to develop an awareness of the particular local situation regarding the process of a person legitimising support for, or use of, terrorist violence. Concerns that a child, young person and/or their parents may hold extremist views or are at risk of being radicalised will be reported to the Hammersmith & Fulham and Kensington and Chelsea Prevent Team.

Hammersmith & Fulham and Kensington and Chelsea Prevent Team

Telephone: 0208 753 5257

[preventionenquiries@lbhf.gov.uk](mailto:preventionenquiries@lbhf.gov.uk)

### **Raising awareness**

The DSL should ensure the School's policies are known and used appropriately. The DSL will do the following:

- ensure, with Governors, that the School's safeguarding and child protection policy is reviewed annually, that the procedures and implementation are updated and reviewed regularly;
- ensure that the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- provide a link with the LADO to make sure staff are aware of training opportunities and the latest policies on safeguarding;
- where children leave the School, provide their new school with their child protection file as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

### **Availability**

One or other of the DSL or Deputy DSL should always be available in school hours for staff to discuss any safeguarding concerns.

### 3. SAFEGUARDING AND CHILD PROTECTION TRAINING

All adults working at the School who may be in regulated activity with children receive annual safeguarding and child protection training in accordance with advice received from the LSCB. This includes staff, all Governors, coaches, temporary staff and volunteers. This should enable them to recognise the possible signs of abuse, neglect and radicalisation and to know what to do if they have a concern.

Training includes:

- reading this policy;
- reading the Staff Behaviour Policy;
- being informed of the identity of the DSL and the Deputy DSL and procedures for informing for of concerns;
- receipt and reading of [part one of KCSIE](#);
- receipt and reading of [what to do if you're worried a child is being abused](#).

Staff will complete a simple assessment to ensure that they understand the key information about safeguarding at the School.

All staff will be issued with Part 1 of KCSIE whenever it is updated by the DfE and reminded of their obligation to read it.

At the end of their training, staff (including temporary), Governors, volunteers and coaches will sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents (see Appendix 5).

#### **4. OTHER SAFEGUARDING AND WELFARE RESPONSIBILITIES**

The School has other significant safeguarding and welfare responsibilities. These include the following:

- health and safety – risk assessment of onsite and offsite activities;
- photography and images;
- safeguarding education;
- bullying;
- e-safety;
- secure premises;

##### **Health and safety: risk assessment of onsite and offsite activities**

The School has a legal duty of care to ensure that its staff and boys are safe whether at school or engaged in some other School-related activity. Full details are contained in the School's health and safety policy and educational visits policy.

Where boys are on-site or engaged in activities organised by the School, the School's safeguarding and child protection policy and procedures apply.

Where other organisations provide services or activities, the member of the School's staff responsible for arranging the services will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

##### **Missing child**

The School's lost child policy applies if a child goes missing while in the School's care, and is in the Staff Handbook and available from the School Office.

##### **Attendance - children missing from education**

The School will report certain attendance issues to the local authority: ten days of unauthorised absence (other than for reasons of sickness or leave of absence); failure to attend regularly, and deletion from the school register at non-standard transmission points. The School is aware that 'a child going missing from education is a potential indicator or abuse of neglect. Where a boy is repeatedly absent from School, his welfare should be carefully considered, specifically whether there are any signs of abuse, neglect, exploitation or radicalisation.

Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit

Is frequently missing/goes missing from education, home or care

Has a parent or carer in custody, or is affected by parental offending

##### **Deleting a boy's name from the register**

The School has regard to KCSIE when deleting a boy's name from the register and will promptly notify the Local Authority in the required circumstances.

A missing child is a potential indicator of abuse, neglect, exploitation, and/or of becoming a terrorist or supporting terrorism. School staff should follow the school's procedure for dealing with children that go missing from St Philip's, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their



going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as FGM.

The DSL would inform K&C Social Services of any child who has gone missing from education, particularly on repeat occasions or who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and K&C Social Services (or in default of such agreement, at intervals determined by the Secretary of State).

So as to identify such children, all "starters and leavers" at St Philip's - at non-standard 'in year' transition points - will be notified to the relevant Admissions Team at RBK&C. The same team will be informed by the Registrar within five days when:

- The school is about to delete a pupil's name from the admission register. Details will be given to the team of the pupil's residence, the name of the person with whom they reside, the date from which they will reside there, and then name of the destination school (if this information can reasonably be obtained and new home address if the pupil is moving to a new school).
- The school is registering a new pupil. Details will be given to the team of the pupil's address and previous school (where they can reasonably obtain this information).
- A child has not arrived at the school as expected (the school having already carried out their own checks).

### **Photography and images**

Full details are contained in the Staff Behaviour Policy and the taking, storing and using images of children policy.

### **Safeguarding education**

In addition to training its staff, the School also recognises its duty to educate its boys in safeguarding. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum including whole-School assemblies, the ICT code of conduct, through the information ('If Something Worries You') contained in the School prep diary. Safeguarding education includes teaching the dangers of radicalisation.

### **Bullying**

The School recognises the importance of constant vigilance with regard to bullying. Full details are contained in the anti-bullying policy.

### **SEN**

The School recognises and exercises its specific duty of care to pupils with Special Educational Needs. Indicators of possible abuse – such as behaviour, mood and injury – will not be attributed to the pupil's disability without further exploration. The school is mindful in particular that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
- pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and
- there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

### **E-safety**

The School does not allow boys to bring internet enabled devices to School. Phones brought into School by boys travelling without their parents must be deposited with the staff member of duty at the door at the start of the school day and collected from the same at the end of the school day. Kindles and other electronic reading devices must not have internet browsing capability. The School notes that any content brought into school on a pupil device is the responsibility of the parent concerned.

However, the School recognises its responsibility to promote e-safety and prevent cyberbullying and radicalisation. The School organises cyberbullying workshops and seminars for boys and parents. Any incidents of cyberbullying will be dealt with according to the School's anti-bullying policy. For further details also see the School's ICT Code of Conduct (for parents and boys) and the staff ICT policy. The School has regard to the government's advice on [The use of social media for online radicalisation](#) and employs filters to ensure that extremist sites are not accessible to pupils.

As schools increasingly work online it is essential that children are safeguarded from potentially harmful and inappropriate online material. Where possible the School will ensure appropriate filters and appropriate monitoring systems are in place.

**Secure premises**

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit. For full details see the School's policy: registering visitors, school security & reporting a security concern.

**APPENDIX 1**

**APPLICATION FORM**

Position applied for .....

Date.....

1. Personal details	
Surname	Forenames
Title	DfE ref no
	National insurance no
Address	Tel (home)
Post code	Tel (mobile)
Email	

2. Education University / College	From	To	Qualification (including degree class)
Secondary education School(s) / College (s)	From	To	A Levels (including grades)

3. Current employer				
Employer's name and address	Position	Start date	Current salary	Why do you wish to leave?

--	--	--	--	--

<b>4. Employment history</b>					
Employer's name & address (most recent first)	Position held	Start date	End date	Salary on leaving	Reason for leaving
<p><i>Please continue on a blank sheet if you require more space</i></p>					

<b>5. Additional information</b>
<p>1. Do you suffer from a disability as described by the Disability Discrimination Act? If YES, please provide details.</p> <p>2. Do you require any special arrangements to be made if you are short-listed for interview? If YES, please provide details.</p> <p>3. Do you have any family or any close relationships with employers or employees, including governors at St Philip's School? If YES, please provide details.</p> <p>4. Have you lived in a country other than the UK for a period of three months or more since the age of 18? If YES, please provide details below (with places and dates)</p>

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**6. Referees**

We require the details of two referees, unrelated, one of whom should be your current or most recent employer, and the Head in the case of a school. The School reserves the right to ask for a reference from any previous employer.

May we contact referees prior to interview? Yes/No

Name	Name
Address	Address
Tel	Tel
Email	Email
How long have you known this referee and in what capacity?	How long have you known this referee and in what capacity?

**7. Criminal Convictions – Rehabilitation of Offenders Act 1974**

St Philip's School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment. The School's Safeguarding and Child Protection policy can be downloaded from [www.stphilipschool.co.uk](http://www.stphilipschool.co.uk) or on request from the School's office.

All applicants who are offered employment in posts involving access to children (whether teaching or support) will be subject to a criminal record check from the Disclosure and Barring Service (DBS) before the appointment is confirmed. This will include details of cautions, reprimands or final warnings, as well as convictions. This means that you are required to declare any convictions or cautions that you may have, even if they would otherwise be regarded as 'spent' under the Rehabilitation of Offenders Act 1974, and any cautions or bind-overs and any prosecutions pending against you. Failure to disclose this information could result in disciplinary action or dismissal.

Any information will be treated in complete confidence.

Details of any convictions or cautions should be provided in a sealed envelope addressed to the Head Master, marked CONFIDENTIAL and enclosed with this application.

**7. Declaration and signature**

I agree that any offer of employment by St Philip's School is subject to satisfactory evidence of the right to work in the UK, satisfactory references and medical and police clearance (where appropriate).

In accordance with the 1998 Data Protection Act, it is agreed that St Philip's School may hold and use personal information about me for personal reasons and to enable the school to keep in touch with me. This information can be stored in both manual or computer form, including the data in Section 2 of the Data Protection Act 1998.

I confirm that the information given in this application and any attachments is factually correct and complete and I understand that any false information may, in the event of employment, result in disciplinary action or dismissal, or referral to the Teachers Misconduct Team (DfE), DBS or the Police, if appropriate.

I have read the notes on Criminal Convictions and agree to an enhanced Disclosure Check of Police Records being made if I am offered the job for which I am applying.

I understand that the job for which I am applying is covered under the Rehabilitation of Offenders Act 1974 (Exceptions Order 1975) and, consequently, no criminal conviction may be considered 'spent'.

I confirm by ticking the appropriate box that:

I do not have any criminal convictions or cautions (spent or otherwise).	
I am not on the Children's Barred List or disqualified from working with children.	
I do not share a household with someone who is disqualified from working with children.	
I am not subject to sanctions imposed by a regulatory body, e.g. the National College for Teaching and Leadership (NCTL).	
I am not subject to a Prohibition Order from the Secretary of State.	

*Please provide details if you have not ticked one (or more) of the boxes.*

Signed

Date

**APPENDIX 2**

**CONFIDENTIAL REFERENCE REQUEST**

**CANDIDATE:**

**POST APPLIED FOR:**

This reference request form is part of our safer recruitment procedure. Please complete this form in full. If you wish to add a conventional narrative reference, please do.

<b>BACKGROUND</b>	
How long have you known the candidate and in what capacity?	
<b>PERSONNEL MATTERS</b>	
Dates of the candidate's employment with you (month and year)	From:  To:
Candidate's duties and responsibilities	
Have there been any competence, capability or disciplinary issues or other concerns? Please include details of any sanctions that have expired.	
Approximately how many days was the candidate absent from work during the last two years of employment with you?	
Do you believe that the candidate is physically and mentally fit to work in a school environment? If not, please elaborate, including any adjustments which have been made to enable the candidate to perform his or her duties.	
<b>For previous employers only:</b> Why did this candidate leave your employment?	



<p><b>For the current employer only:</b> Current salary and details of post (please attach a job description, if available)</p>					
<p><b>SUITABILITY FOR POST</b></p>					
<p>Please indicate the candidate's strengths and weaknesses, particularly in the classroom, and in his/her contribution to the corporate life of the School.</p>					
<p>Do you believe that the candidate is suitable for this position? Please comment on motivation as well as abilities.</p>					
<p>Would you re-employ the candidate? If not, please explain why.</p>					
<p><b>Please rate the candidate against the following criteria</b></p>	<p><b>Needs substantial development</b></p>	<p><b>Needs development</b></p>	<p><b>Acceptable</b></p>	<p><b>Strong</b></p>	<p><b>Outstanding</b></p>
<p>Ability to keep to deadlines</p>					
<p>Assessment and marking</p>					
<p>Attendance</p>					
<p>Attitude to work</p>					
<p>Classroom management</p>					
<p>Commitment to school events</p>					
<p>Extra-curricular involvement</p>					

Planning and preparation for lessons					
Reliability					
Professional relationships with pupils					
Professional relationships with colleagues					
Professional relationships with parents					

<b>SUITABILITY TO WORK WITH CHILDREN AND DISCIPLINARY RECORD</b>	
<p>Are there any reasons why the candidate should not have access to children? Please include any allegations or concerns that have been raised about the applicant that relate to the safety and welfare of children, and the outcome of these concerns. Please include all disciplinary offences related to children, even if 'time expired'.</p>	

**Referee's contact details**

Name		Position	
Address			
Daytime telephone number		Signature	
Evening telephone number		Date	

Please kindly return this form to Mr Alexander Thomas, Head Master, St Philip's School, 6 Wetherby Place, London, SW7 4NE

**Email** [a.thomas@stpschool.co.uk](mailto:a.thomas@stpschool.co.uk)

### APPENDIX 3

#### PRE-EMPLOYMENT HEALTH QUESTIONNAIRE

#### STRICTLY CONFIDENTIAL

This questionnaire should be completed as fully as possible in capital letters.

The information will be treated in confidence (between the School and its doctor).

#### Identity and contact information

Forename		Title (Dr, Mr, Mrs, Miss, Ms)	
Surname		Date of birth	
Address		Name and address of GP	
Position applied for			

#### Medical history

Please complete the following questions by ticking the appropriate box. If the answer is 'yes', give details including (a) date, (b) amount of time lost from work/school (if any), treatment (if any).

Have you ever suffered from any of the following illnesses?			
	Yes	No	If yes, please give details
Visual defects/ eye conditions (including colour blindness)			
Hearing defects/ ear conditions			
Severe anxiety, depression, other psychiatric disorder			
Paralysis or other neurological disorder			
Fainting attacks, blackouts, epilepsy or fits			
Recurrent headaches, migraine			
Vertigo, giddiness or tinnitus			
Heart disease, high blood pressure			
Asthma, bronchitis, tuberculosis or other chest disease			
Liver disorder			
Kidney or bladder problems			
Recurrent backache, arthritis, rheumatism			
Any blood disorder			
Eczema, dermatitis, other skin conditions			
Diabetes, thyroid or other gland problems			
Hay fever, allergies to drugs, animals etc.			
Any recurrent infections			
Any impairment of immunity to infection			
Hernia			
Any alcohol or drug related problems or illness			

Any other medical condition, physical or mental, not mentioned above			
<b>Have you?</b>			
	<b>Yes</b>	<b>No</b>	<b>If yes, please give details</b>
Ever undergone a surgical operation or been admitted to hospital for any reason?			
Had more than 20 days' sickness absence in the past two years?			
Ever been, or are, a Registered Disabled Person?			
<b>Present health status</b>			
	<b>Yes</b>	<b>No</b>	<b>If yes, please give details</b>
Are you at present taking any medication prescribed by a doctor?			
Are you at present receiving any treatment prescribed by a doctor?			
Do you have any physical disability necessitating special aids, or requirement for access to premises?			
Do you have any other relevant health problems?			

**Declaration**

- I declare that, to the best of my knowledge, the information I have given is correct and that I know of no reasons, on grounds of mental or physical health, why I should not be able to discharge the responsibilities required by the post in question.
- I understand that the School is legally required to verify my medical fitness for the role, that my employment with the School is therefore conditional upon the verification of my medical fitness and that I may be required to attend a medical examination.
- I understand that failure to disclose relevant information or giving false information may result in termination of my employment or the withdrawal of an offer of employment.
- I consent to the School retaining this medical form and any other information about my medical fitness on my confidential personnel file for the duration of my employment. I understand and agree that the School may use any medical information about me to help discharge its obligations towards me as my employer as and when it is necessary, or reasonable, to do so. I further understand and agree that the School may confidentially retain any medical information about me for a period of six months after my employment terminates, following which it will be securely destroyed.
- I hereby give my consent to St Philip's School processing the data supplied above.

**Signature**.....

**Date** .....

**To be completed by the School in consultation with the School doctor as needed:**

Fit for employment specified:

Detail of any adjustments to be considered:

Name:

Signature:

Date:

**APPENDIX 4**

**RISK ASSESSMENT FOR EMPLOYMENT PENDING DBS DISCLOSURE**

Assessment carried out by:.....(DSL) Assessment date:.....

**NB: No person without the correct clearance will be allowed to engage in regulated activity at St Philip's School.**

<b>Name</b>		<b>Job title</b>	
<b>Expected date of commencement:</b>		<b>Details of any previous DBS checks:</b>	
<b>Date DBS check requested:</b>		<b>Photographic ID / proof of address seen:</b>	
<b>Two satisfactory references seen:</b>		<b>Application form received / gaps in work history fully explored: N/A</b>	
<b>Barred list check carried out:</b>		<b>Additional relevant information</b>	

**Level of risk**

The employee has not yet received his/ her DBS disclosure and therefore may be unsuitable to work with children. What level of risk does the School estimate the employee may pose?

<b>Low</b>	<b>Medium</b>	<b>High</b>

**Management of risk**

If the Head Master judges that it is reasonable for the employee to begin work at the School, what measures will be taken to manage risk?

<b>Measure</b>	<b>Yes (if applicable)</b>
Supervision by a current and fully-checked member of staff	
The above-named will not be in regulated activity with children (i.e. unsupervised access)	
The above-named has read, understood and agreed to adhere to the School's Safeguarding and Child Protection Policy, including the Staff Behaviour Policy	
The arrangements established by the School will be reviewed by the DSL on a fortnightly basis until the submission of a valid DBS certificate	
Any additional measures should be noted here:	

**APPENDIX 5**

**CONFIRMATION OF RECEIPT OF SAFEGUARDING POLICIES AND TRAINING**

Name: .....

Date of joining school: ...../...../.....

Date of induction (or of annual renewal): ...../...../.....

Name and designation of staff member responsible for induction:  
.....

Declaration	Tick
I confirm that I have received, read and understand the School’s Safeguarding and Child Protection Policy, including the procedure for reporting concerns about a child.	
I confirm that I have read and understand part one of <i>Keeping Children Safe in Education</i> .	
I confirm that I have read and understand the Staff Behaviour Policy and Whistleblowing Policy.	
I can confirm that I have read and understood <i>What to do if you’re worried a child is being abused</i> .	
I confirm that I have been made aware of my duty to safeguard and promote children’s welfare.	
I confirm that I know the identity of the Designated Safeguarding Lead (DSL) and how to contact them.	

Signature: .....

Date: ...../...../.....

*Please sign and return this form to the Designated Safeguarding Lead:*

DSL signature: .....

Date: ...../...../.....

THIS FORM MUST BE RETURNED BY THE DSL  
TO THE SCHOOL OFFICE AND KEPT ON RECORD.