

# St Martin-in-the-Fields High School for Girls

A CHURCH OF ENGLAND ACADEMY  
CO-ED SIXTH FORM



## **SAFEGUARDING AND CHILD PROTECTION POLICY**

**APPROVED: DECEMBER 2021**

**DATE TO BE REVIEWED: DECEMBER 2022**

## SAFEGUARDING AND CHILD PROTECTION POLICY

Approved: December 2021

Review: December 2022

At St Martin's we are a family community built from Christian values. We believe, most importantly, that we belong to something much greater than ourselves – Christ is at the centre of our Church of England school community. In all that we do, we seek to show God's care for our students. We live, love and learn together. Students of all faiths and none are welcomed into our school family. We value, respect and celebrate all faiths and cultures because we are inspired by a welcoming, inclusive and loving God, seen in Jesus Christ and lived out through the Holy Spirit, alive in every person.

### Our vision

A high achieving Christian Girls' School with a thriving mixed Sixth Form where excellence is exemplified and encouraged, ensuring an enriching educational experience where our students appreciate that learning is not a matter for school but for life and productive citizenship.

### Our Mission

Inspired by our motto "Caritate et Disciplina" Our mission is to create a safe, caring, happy and inclusive community underpinned by our Christian values. We want our students to shine and grow together in faith and knowledge, developing their unique gifts and talents both in the classroom and in the wider life of the school and beyond.

We believe that reverence for God, respect for self, others and the environment is essential in today's society and we therefore dedicate our effort towards fostering these virtues. During their time at St Martin's, they will be empowered to fulfil their learning potential because they are **Hopeful, Enquiring, Respectful, Organised, Independent and Collaborative**. Our students will fulfil their academic potential, but more than this, they will develop the skills, competencies and personal qualities and characteristics that will help them to be successful in the future in whatever route they choose to take.

*'Show yourself in all respects to be a model of good works, and in your teaching show integrity, dignity and sound speech. Titus 2:7-8*

### St Martin's School Prayer

Dear God,

We thank you for your love and your promise to be with us. At school or work, at rest or play, help us to feel near to you and hear your voice. Inspired by St. Martin's example, may we always show respect, encourage one another and serve our community. Help us to be aware of our talents, be enquiring and independent. May your gifts of faith, hope and love shine in us today.

Amen

*Inspired by St Martin's School Prayer*

**We nurture. We develop. We educate. We are St Martin's.**

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# Safeguarding and Child Protection

St Martin-in-the-Fields High School for Girls (St Martin's) is committed to providing a secure environment for students, where children feel safe and are kept safe. All adults at St Martin's recognise that safeguarding is everyone's responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children. In adhering to this policy, and the procedures therein, staff and visitors will promote a climate where children and adults will feel confident about sharing any concerns that they may have about their own safety or the well-being of others and will contribute to St Martin's delivery of the outcomes to all children, as set out in s10 (2) of the Children Act 2004. This Child Protection Policy is one element in our whole school arrangements to safeguard and promote the welfare of children in line with our statutory duties set out at s175 of the Education Act 2002.

At St Martin's we are committed to Safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that concerns them. We will always act in the best interest of the child.

Our school's Child Protection Policy also draws upon the guidance contained in; Working Together 2018, the London Child Protection Procedures and DfE Guidance Keeping Children Safe in Education, 2021. These documents are kept in the office of the Designated Safeguarding Lead (DSL).

We recognise that Safeguarding is more than a contribution to Child Protection matters and we will use the curriculum generally, and Wellbeing in particular, to ensure our students recognise risk and build resilience to manage any such risk themselves where appropriate. At St Martin's students are taught about Safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students are taught to recognise when they are at risk and how to get help when they need it. Students will be encouraged to make use of internal systems to whistle blow or raise any issue of safety in confidence. The school assesses the risks and issues in the wider community when considering the well-being and safety of its students. We also recognise and accept that children have a right to be heard and will additionally facilitate this by ensuring that students are able to speak to a significant adult and where applicable we will review and modify our policies accordingly. Additionally we will work in partnership with parents and carers and will encourage parents to comment on and contribute to the evolution of our policies.

In liaising with parents and carers we will ensure that they are reminded that St Martin's has a duty to report concerns that we may have over the safety or well-being of a student as part of our statutory duties to protect children from significant harm and/or neglect. Parents and carers will also be reminded that, where appropriate, any referral will be discussed with parents and carers before the referral is made, however parents and carers will not be contacted nor will the referral be discussed where it is felt that to do so will place the child at an increased risk of harm. In any event parents and carers will be reminded that all referrals are made in the best interest of the child.

Where a student is subject to a Child Protection Plan the Designated Safeguarding Lead (DSL) will monitor the student and the plan and ensure that the recommendations for St Martin's School as part of the Child Protection Plan are delivered upon.

The Head Teacher will also ensure that a member of teaching staff is appointed as a Designated Teacher for Children Looked After (DTCLA). This person will promote the educational achievement of

our CLA Children and will also contribute to the 'in care reviews' and/or meetings regarding CLA children and to the child's Personal Education Plan (PEP).

In delivering our responsibilities as set out in this policy St Martin's School will develop effective links with relevant agencies and co-operate with their child protection enquiries as appropriate, this will include attendance at Child Protection Conferences and Reviews, Core Group Meetings, and CLA Reviews as necessary. Where staff other than the DSL attend any of the aforementioned meetings St Martin's School will ensure that they are properly trained to do so and by attending such meetings they will have been given the appropriate authority to make decisions and commit resources on behalf of the school.

Following such meetings we will ensure that all relevant information is co-ordinated and shared as appropriate.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

## Child Protection

All staff at St Martin's must recognise and accept that children have a fundamental right to be protected from harm.

The four categories of child abuse are as follows:

1. Physical Abuse
2. Emotional Abuse
3. Sexual Abuse, and
4. Neglect

### **Physical Abuse**

*May include:* Hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child including the deliberate fabrication or causation of illness in a child (now known as Fabrication or Induced Illness FII).

*May be recognised by:* Physical injury such as bruising, bite marks, burns and scalds, fractures but also by aggressive behaviour or learning difficulties due to neurological damage. It may also be an indicator of concern where a parent gives an explanation inconsistent with the injury or gives several different explanations for the injury. Other indicators of physical abuse may include flinching or cowering and accounts of how injuries have happened may be vague to inconsistent or are unexplained. Children may wear inappropriate clothing to cover marks or injuries and/or may be reluctant to go home.

It is not uncommon for children to have accidental bruises but bruising on the face, around the eyes, around the mouth, behind the ears or consistent with a grab or which have the shape of an object

(e.g. brush, slipper, belt, hand etc.) must be considered as possible indicators of harm as should multiple or repeated bruising to an area such as the head or an area unlikely to be bruised accidentally.

It is not appropriate for any member of staff to undress, photograph or body map any child in an attempt to see physical injury: this is the role of child protection and investigating agencies. However it is acceptable for a member of staff to draw a body map if the child feels comfortable with showing the injury.

### **Emotional Abuse**

*May Include:* 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may be difficult to recognise as signs are usually behavioural rather than physical. Signs of emotional abuse may be associated or similar to other forms of abuse so presence of emotional abuse may indicate other abuse is prevalent as well.

### **Sexual Abuse**

*May Include:* Involving or forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. Such activities may involve sexual acts (penetrative or non-penetrative) or may include involving children in watching or taking part in pornographic material or encouraging children to behave in sexually inappropriate ways.

*May be recognised by:* Inappropriate sexualised conduct, age inappropriate sexualised play or conversation, sexually harmful behaviour – contact or non-contact, self-harm, eating disorders, continual, inappropriate or excessive masturbation, anxiousness or unwillingness to remove clothes – sports / PE etc., pain or itching in genital area, blood on underclothes, bruising in genital region and / or inner thighs etc.

A sexually abused child may also be recognised by disturbed behaviour such as sadness, depression or loss of self-esteem. Disclosure of sexual abuse must be taken seriously as it is recognised that children are frequently scared to disclose due to guilt or fear and often children have taken great courage to disclose – therefore it is important not to minimise or give your own view or interpretation of their account.

All staff must be aware that a child under the age of 13 years is not legally capable of consenting to sexual activity and so sexual activity with a child under 13 is an offence under the Sexual Offences Act. Such activity will be taken to indicate that that child/ren are at risk of significant harm and must be referred accordingly in line with the agreed procedures as set out in the London Child Protection

Procedures. Sexual activity with a child under 16 is also an offence but may possibly be less serious than that of a child under 13, especially where children are of a similar age and there is no power imbalance, coercion, or disinhibitor such as alcohol or drugs involved. However serious consideration will always need to be given as to whether to refer where cases of sexually active children become known or are disclosed; as per the London Child Protection Procedures. In all cases you must discuss your concerns or share your knowledge with our Designated Safeguarding Lead for consideration of a referral to Social Care.

In light of the above all staff must recognise that sexual abuse of children is not an exclusively male practice and may be perpetrated by females but also by other children; such abuse must not be treated with any less rigour in such cases.

### **Neglect**

*May include:* 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 (growth and intellect) such as failing to provide adequate food, shelter (including keeping children safe), clothing, or neglect of or unresponsiveness to a child's basic emotional needs.

*May be recognised by:* Being constantly hungry; constantly tired; having a poor state of clothing; being emaciated; having untreated medical problems; being frequently late or having poor or non-attendance at school; having low self-esteem; displaying neurotic behaviour and/or having poor social relationships, having poor personal hygiene. A neglected child may also be apathetic, fail to thrive, or be left with or in the care of adults under the influence of alcohol or drug misuse, or be left home alone<sup>2</sup>.

<sup>2</sup> *Whilst there is no set age in law for a child to be legally left home alone the responsibility rests with the parents to make satisfactory arrangements for the care of their children and must not leave their children unsupervised "in a manner likely to cause unnecessary suffering or injury to health of the child". A referral will be made to Social Care where our school has concerns that the arrangements that a parent makes are unsafe and thus render the child/ren at risk of significant harm; this may include independent travel arrangements and collection / escorting arrangements by others, including siblings, that the school considers unsafe.*

## **Child Sexual Exploitation (CSE)**

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

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;

- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of the Internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child Sexual Exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

Further details can be found in - Child Sexual Exploitation: Definition and a guide for practitioners (DfE 2017)

## **Child Criminal Exploitation (CCE)**

This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) In exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

the victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve criminal contact; it can also occur through the use of technology.

some of the following can be indicators of CCE:



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

## County Lines

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

Exploitation is an integral part of the County Lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as County Lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A young person’s involvement in County Lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person’s lifestyle should be discussed with them. Some potential indicators of County Lines involvement and exploitation are listed below, with those at the top of particular concern:

- persistently going missing from school or home and / or being found out-of-area;
- unexplained acquisition of money, clothes, or mobile phones
- excessive receipt of texts / phone calls and/or having multiple handsets
- relationships with controlling / older individuals or groups
- leaving home / care without explanation
- suspicion of physical assault / unexplained injuries
- parental concerns
- carrying weapons
- significant decline in school results / performance
- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being.

Further details can be found in - Criminal exploitation of children and vulnerable adults: County Lines Guidance (Home Office, September 2018). KCSIE 2021.

# Peer on Peer Abuse

Staff should be aware that Safeguarding issues can manifest themselves via Peer on Peer Abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.

St Martin's has a 'Zero-Tolerance when it comes to Abuse. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At St Martin's we believe that all children have a right to attend school and learn in a safe environment. Students should be free from harm by adults in the school and by other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy. There is a recognition that it is more likely that girls will be victims and boys' perpetrators, but that all peer-on-peer abuse is unacceptable and will be taken seriously.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a Safeguarding allegation against a student, some of the following features will be found.

The allegation:

- is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other students in the school
- indicates that other students may have been affected by this student
- indicates that young people outside the school may be affected by this student

Sexting is sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet. Sharing nudes and semi-nudes (previously known as 'sexting')

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020): 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'. If any devices need to be seized and passed onto the police, then the device(s) should be confiscated, and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

St Martin's Child Protection Policy includes:

- procedures to minimise the risk of peer-on-peer abuse;
- the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously;
- how allegations of peer-on-peer abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other children affected by peer-on-peer abuse will be supported;
- a recognition that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported;
- a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off, for example, as "banter", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children;
- recognition that it is more likely that girls will be victims and boys' perpetrators, but that all peer-on-peer abuse is unacceptable and will be taken seriously; and
- the different forms peer on peer abuse can take, such as:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - abuse in intimate personal relationships between peers;
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - Sexual Violence and Sexual Harassment.

## **Bullying**

Bullying is a specific form of abuse which may be prevalent in schools and is defined as deliberately hurtful behaviour, usually repeated over a period of time where it is difficult for the victims to defend themselves. This may also be seen as child on child abuse as noted above.

The extent of bullying can include emotional and / or physical harm to such a degree that it constitutes significant harm due to the extent to which it affects the health or development of the child subject to the bullying behaviour. Bullying may also be within digital or ICT based environments, sometimes known as 'Cyber-Bullying' and may include 'Sexting', which must be treated as seriously as any other form of bullying and dealt with accordingly. It must be noted that bullying may also constitute criminal behaviour and therefore certain instances of bullying may need to be reported to the police.

Please refer to our separate Anti-Bullying Policy and Acceptable Use of Digital Technologies Policy for further information. Also (UKCIS) Guidance: Sexting in Schools and Colleges, responding to Incidents and Safeguarding Young People (2017).

## **Domestic Abuse**

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

## Definition

The Domestic Abuse Act 2021 (Part 1) defines Domestic Abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

St Martin's is a part of 'Operation Encompass' and has a dedicated school email for this which is picked up by the Designated Safeguarding Lead

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

At St Martin's School we will be alert to the possibility of Domestic Abuse and allow an opportunity for the abused partner (predominantly the woman but not exclusively so) to disclose. We will treat that disclosure sensitively and refer the matter to Social Care where there is a child or children at risk of significant harm and/or neglect.

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

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. (See KCSIE 2021)

We also recognise that other practices are defined as Domestic Abuse, such as so called Honour Based Violence, Forced Marriage and Female Genital Mutilation. The definition of Domestic Violence, revised in 2013, also includes any pattern of controlling or coercive or threatening

behaviour, (psychological, physical, sexual, financial or emotional) between those aged 16 or over who are or who have been intimate partners or family members regardless of gender or sexuality.

So-called 'Honour-Based' Violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are forms of abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency and complete a Safeguarding Referral on the Workflow.

## **Forced Marriage**

In St Martin's School we recognise forced marriage as an abuse of human rights and a form of domestic abuse and, where it affects children and young people, child abuse.

Forced marriage, as distinct from an arranged marriage, is conducted without consent and under duress. We therefore accept that coercion and duress may be perpetrated by partners but also by extended family members and that this constitutes Domestic Violence, in line with the Government's definition of domestic violence and is closely linked to so-called Honour Based Violence.

In cases of forced marriage we will follow the guidance as set out in the London Child Protection Procedures as a child who is being forced into marriage is at risk of significant harm through physical, sexual and emotional abuse. If any member of staff receives a disclosure or is aware that a Forced Marriage is about to happen this must be disclosed to the Designated Senior Lead Person for Child Protection without delay so that the appropriate referrals may be made and/or protective measures may be put in place, especially as the child/ren may be taken out of the country.

## **Female Genital Mutilation**

Female Genital Mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country

(especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

It is accepted that some female students in our school may be at risk of being subject to Female Genital Mutilation (FGM). FGM is defined by the World Health Organisation as: all procedures, but not therapeutic or essential surgical operations, which involve partial or total removal of the external female genitalia or injury to female genital organs for non-therapeutic reasons. FGM is considered as a cultural norm by some communities and some also consider FGM necessary for religious reasons.

We will always challenge such abusive cultural norms as the welfare and safety of the child is always paramount; equally we also recognise that FGM is not endorsed as a religious practice.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the Designated Safeguarding Lead and Children's Social Care. The duty does not apply in relation to at risk or suspected cases.

From a Child Protection perspective a child for whom FGM is planned is at risk of significant harm through physical and emotional abuse. It may also be considered as sexual abuse.

Typical identifiers are:

- Family comes from a community known to practice FGM
- Family / child talks about a long holiday
- Family / child may ask to be excused PE / swimming on return
- Family / child may confide that she is going to a 'special ceremony' when on holiday
- Female child is known to have a mother that has been subject to FGM
- Female child is known to have a sister that has already undergone FGM

Equally the child may be aware of what is going to happen and make disclosure or seek help.

If any member of staff receives a disclosure or is aware that FGM is about to happen this must be disclosed to the Designated Safeguarding Lead for Child Protection without delay so that the appropriate referrals may be made and/or protective measures may be put in place, especially as the child/ren may be taken out of the country.

## **Honour Based Abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), Forced Marriage, and practices such as Breast Ironing. All forms of so-called HBA are abused (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency and complete the Safeguarding Referral Form on the Workflow.

## **Mental Health**

All staff at St Martin's are aware that Mental Health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. To further raise awareness of Mental Health problems, some training has been given for this through the virtual Trauma course.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a Mental Health concern about a child that may also be a Safeguarding concern, they should raise the issue immediately by informing the Designated Safeguarding Lead or the Deputy DSL by completing the Safeguarding Referral Form on Workflow.

## **Children Missing Education (CME)**

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when students are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2021) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions). Please refer to our Attendance policy
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take students off-roll when they:

1. Leave school to be home educated
2. Move away from the school's location
3. Remain medically unfit beyond compulsory school age
4. Are in custody for four months or more (and will not return to school afterwards);  
or
5. Are permanently excluded

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the student's new school and their expected start date.

Further information can be found in - Children missing education: statutory guidance for local authorities (DFE, September 2016)

## Students Special Educational Needs and Disabilities

Children and young people with Special Educational Needs and Disabilities can face additional Safeguarding challenges because: there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEN and Disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and difficulties may arise in overcoming communication barriers. At St Martin's we identify pupils who might need more support to be kept safe or to keep themselves safe by:

- Regular liaison between the SEND department and the DSL/DDSL, including formal calendered meetings via the Pastoral Board
- Ensuring that these students have a specific adult that they feel comfortable speaking to in school
- Ensuring that staff are aware of these additional vulnerabilities and always pass on concerns
- Ensuring that staff receive appropriate training and CPD
- Ensuring staff are aware these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- Ensuring staff are aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Staff are aware of communication barriers and difficulties in managing or reporting these challenges

At St Martin's we provide (extra Pastoral Support and attention for these children]) along with *ensuring any appropriate support for communication is in place, for example, Inclusion Projects, ELSA, SALT and Mentoring.*

### Social Workers

St Martin's staff are aware that pupils who have a Social Worker have potentially a greater risk of harm. They will be aware of which pupils have a Social Worker and to raise any concerns they may have immediately to the Designated Safeguarding Lead and to complete the Safeguarding Referral on the Workflow.



At St Martin's children who have a Social Worker can be supported in a variety of ways. For example, by having a Trusted Adult, receive in-house Mentoring or be involved in the Inclusion Programme to name a few.

## Private Fostering

A Private Fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery. Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a Private Fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility. School staff should notify the Designated Safeguarding Lead when they become aware of Private Fostering arrangements. The Designated Safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## Prevent Duty

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead and complete the Safeguarding Referral on the Workflow.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling Extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff are alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

## **Extremism and Radicalisation**

Please refer to our Preventing Extremism and Radicalisation Safeguarding Policy for the full procedural framework on our safeguarding duties in protecting our students from extremism and radicalisation.

### Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

We will support students who may be vulnerable to such influences as part of our wider Safeguarding responsibilities and where we believe a student is being directly influenced by extremist materials or influences. In such instances our school will ensure that the student is offered mentoring and will seek external support from the Local Authority and/or local partnership structures working to prevent extremism.

However, staff at St Martin's School will be alert to the fact that whilst Extremism and Radicalisation is broadly a Safeguarding issue there may be some instances where a child or children may be at direct risk of harm or neglect. For example; this could be due to a child displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with. Equally staff may become aware of information about a child's family that may equally place a child at risk of harm or a student may disclose that they are being exposed to extremist views or practices at home or in their community. (These examples are for illustration and are not definitive or exhaustive.)

Therefore all adults working in St Martin's School (including visiting staff, volunteers, contractors, and students on placement) are required to report instances where they believe a child may be at risk of harm or neglect to the Designated Safeguarding Lead or Headteacher, including any harm believed to be through Extremism or Radicalisation.

# Online Safety

Online safety is a very important part of Safeguarding and St Martin's aims to have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors. We aim to deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology. This will be done through a programme of education following the recommendations of *Teaching Online Safety in Schools* (DFE, June 2019) and delivered primarily, although not exclusively, through the Wellbeing and Computer Studies curriculum.

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

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

We will use the school's existing Safeguarding procedures as the mechanism to identify, intervene and escalate an incident where appropriate and will ensure that as a school, we are continually reviewing and updating our approach to take into account emerging needs. For further information please refer to the school Online Safety Policy, KCSIE 2021 (Annex C) and *Teaching Online Safety in Schools* (DFE, June 2019).

## Responsibility and Immediate Action

All adults working at St. Martin's (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Senior Teacher with responsibility for child protection.

<b>The Designated Safeguarding Lead is:</b>	<b>Mrs Suganthy Wilson</b>
<b>The Deputy Designated Safeguarding Lead is:</b>	<b>Ms Baird</b>
<b>Headteacher is:</b>	<b>Ms Josephine Okokon</b>
<b>The Designated Teacher for Children Looked After is:</b>	<b>Ms Baird</b>
<b>The Lead Governor for Safeguarding is:</b>	<b>Rev Erica Wooff, Chair of Governors</b>

Where a disclosure is made by a child or where there are signs that a child is suffering significant harm or is likely to suffer significant harm or is being neglected the Designated Safeguarding Lead may take advice before making a referral to the relevant local authority's duty team.

Where there are any doubts as to the seriousness of this concern or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Headteacher and/or Lambeth CYPS Duty Team and/or the Local Authority Designated Lead Officer for Education or his deputy. If the DSL is not available, staff should speak to a member of the SLT and/or take advice from local children's social care (KCSIE 2021)

In circumstances where a child has a suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency assistance. If a student

is thought to be at immediate risk (because of parental violence or intoxication, for example) urgent police intervention will be requested. Particular vigilance will be exercised in respect of children who are subject to a Child Protection Plan and any incidents or concerns involving these children will be reported immediately to Social Care (and confirmed in writing). This will also be the case for other children who may be considered vulnerable such as disabled children, SEN children or Children Looked After, for example. In all cases of injury to a child consideration will always be given as to whether an urgent paediatric medical assessment is required to document injuries or to protect any forensic evidence.

Where it is suspected that a child may be at further risk of significant harm if the parent is spoken to, nothing will be said to the child's parent/carer without first discussing the matter with Social Care R&A Duty. However, no significant decisions regarding the child can be authorised by staff at the school unless the parent or carer with parental responsibility has given consent.

All staff must understand that there are no circumstances under which a member of staff may promise a child that they will keep any disclosure a secret or confidential – they must always pass this information on in the best interest of the child.

Keeping Children Safe in Education (2021) states that The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe and this includes allowing practitioners to share information without consent.

## **Role of the Designated Safeguarding Lead**

The Designated Safeguarding Lead works in line with the responsibilities as set out at Annex B of the DfE Guidance outlined above in respect of referrals, training and awareness raising. The Designated Safeguarding Lead is the focus person and local 'expert' for school staff, and others, who have concerns about an individual child's safety or well-being and is the first point of contact for external agencies that are pursuing C.P. investigations. The Designated Safeguarding Lead also co-ordinates the school's representation at C.P. conferences and the submission of written reports for conferences (a meeting of all relevant agencies). When an individual concern/incident is brought to the attention of the Designated Safeguarding Lead she will be responsible, if appropriate, for obtaining advice from Local Authority Designated Officer (LADO) for Child Protection and/or consulting with Social Care as appropriate to decide whether or not this should be formally referred as a child protection case, or the Safeguarding Partners.

The Designated Safeguarding Lead is responsible for Safeguarding and Child Protection at St Martin's High School. The key role of the Designated Safeguarding Lead is to:

- Manage referrals from school staff or any others from outside the school;
- Work with external agencies and professionals on matter of safety and safeguarding;
- Undertake training and ensure staff know how to complete a referral;
- Raise awareness of Safeguarding and Child Protection amongst the staff and parents; and
- Ensure that Child Protection information is transferred to the pupil's new school
- Be aware of pupils who have a Social Worker

- Help promote educational outcomes by sharing the information about the Welfare, Safeguarding and Child Protection issues with teachers and school and college leadership staff.

The Designated Safeguarding Lead and any Deputies should liaise with the three Safeguarding Partners and work with other agencies inline with 'Working Together to Safeguarding Children'. NPCC guidance for schools & colleges - [When to call the police](#) should help the Designated Safeguarding Leads to understand when they should consider calling the police and what to expect when they do.

NPCC- National Police Chief's Council

## The three Safeguarding Partners:

The Local authority

The Clinical Commissioning Group of the area

The Chief Police officer of the area

Ensure that the school contributes to multi-agency working in line with 'Working Together to Safeguard Children'.

The three Safeguarding Partners, the Local Authority, the Clinical Commissioning Group and the Chief of the Police are responsible to make arrangements to work together with relevant agencies.

It is expected that the three partners will name schools & colleges as relevant agencies and reach their own conclusions on the best way to achieve the active engagements in a meaningful way.

The three partners should make arrangements to allow all schools in the local area to be fully engaged, involved and included in the safeguarding arrangements. If named as a relevant agency, schools and colleges are under a duty to co-operate with the published arrangements.

The Designated Safeguarding Lead will ensure that all child protection records are kept separately from student records and are stored securely, by encryption and/or password protecting electronic files or ensuring that paper records are secured in a locked cabinet with restricted access.

The Designated Safeguarding Lead will have oversight of the delivery of school recommendations within Child Protection Plans and will disseminate information to relevant staff members as appropriate. The Designated Safeguarding Lead will keep the Headteacher, and Governing Body advised of all such matters including where Child Protection Plan recommendations are met or otherwise.

The 'Virtual' Headteacher has responsibility to promote the education of children who have a Social Worker. Regular feedback in the form of reports, PEPs contributions to assessments and meetings is given to the named Social Workers and copies of these are kept securely in the pupils concerned Child Protection Files.

## Early Help

St Martin's recognises that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life. All school staff are trained to notice any concerns about children which may help to identify that they would benefit from early help.

Children and families may need support from a wide range of local agencies. Where a child and family would benefit from co-ordinated support from more than one agency (e.g. education, health, housing, Police), the school will use of an early help assessment and identify what help the child and family require to prevent their needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The school is committed to working in partnership with children, parents and other agencies to:

- identify situations in which children and/or their families would benefit from early help
- undertake an assessment of the need for early help
- provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the child's outcomes.

All staff should consider the following factors which may initiate the requirement for Early Help. The young person:

- is disabled and has specific additional needs
- has special educational needs
- is a young carer
- is showing signs of engaging in antisocial or criminal behaviour
- is in a family whose circumstances present challenges for the child, such as substance abuse, adult mental ill health, domestic abuse
- is showing early signs of abuse and/or neglect
- is particularly vulnerable in any of the ways identified the paragraph above

Staff should discuss their concerns with the designated safeguarding leads.

If the child's situation does not improve and/or the child's parents and/or the child do not consent to early help assessment being initiated, the school will make a judgement about whether, without help, the needs of the child will escalate. If so, a referral to Children's Social Care may be necessary.

## **Information sharing and confidentiality**

St Martin's will ensure that there are arrangements in place setting out processes for sharing information with the three safeguarding partners, other organisations, agencies and practitioners.

The school will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection act 2018 and the GDPR. This includes allowing relevant staff to share information without consent where there is good reason to do so and the sharing of information will enhance the Safeguarding of a child in a timely manner, or to gain consent would place the child at risk.

St Martin's will withhold providing information where the serious harm test is met. For example in a situation where a child is in a refuge or another form of emergency accommodation.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and over are able to give their own consent.

# Teaching children about Safeguarding

St Martin's will ensure children are taught about keeping themselves safe, including online safety as part of providing a broad and balanced curriculum.

This may include covering relevant issues through Relationships and Sex Education which, for all secondary schools, is mandatory from September 2020. However, due to Covid 19, the DfE has allowed school flexibility to decide how they discharge their duties effectively during the first year of compulsory teaching and to take a phased approach when introducing these subjects.

## Role of Governing Board

In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education, 2021' the Governing Board will challenge the school's Senior Leadership Team on the delivery of this policy and monitor its effectiveness. Governors will review this policy every year and may amend and adopt it in accordance with any new legislation or guidance or in light of their quality assurance of the delivery of this policy.

In doing so neither the Governing Board or individual governors have any role in dealing with individual child protection cases, except in the discharge of their functions in dealing with an allegation of abuse against the Headteacher. In cases of allegations against the Headteacher it will be the Chair of Governors as the Child Protection Governor, who will carry out this statutory function.

At St Martin's we also have a governor responsible for championing Child Protection and Safeguarding issues within the school and on the Governing Board. Please note this is not the role outlined in the above paragraph. This governor will liaise with the Headteacher on Child Protection and Safeguarding matters and may submit reports to the Governing Board.

## Training

Whole school in-service training will be organised for staff and governors at least every three years and will comply with the prevailing arrangements agreed by the Local Authority and Lambeth's Safeguarding Children Board and will be in line with the training groups outlined in 'Working Together to Safeguard Children 2019'. The Designated Safeguarding Lead will attend Lambeth training courses as necessary and appropriate inter-agency training organised by organisations such as the Lambeth Safeguarding Children Board at least every two years. The Deputy Designated Safeguarding Lead will also be given the opportunity to attend these courses.

All staff will receive mandatory induction, as specified in Working Together 2019, which will include familiarisation with our Child Protection and Safeguarding arrangements and policy, the procedures to be followed in cases of concern as set out in this policy document including the school's response to children who go missing from education and the name of our Designated Safeguarding Lead and their Deputy. As set out in Keeping Children Safe in Education staff will also receive a copy of the Behaviour for Learning policy, and the Staff Code of Conduct. All staff will also be required to read the 8-page summary of the Government guidance 'Keeping Children Safe in Education, 2021' and will sign to indicate that they have received it and have read the document or they must complete the online training which provides an update to the document.

Supply and other temporary staff will also be given the documents outlined in the preceding paragraphs, and other relevant policies, on arrival, by the administration staff. All visitors to the



school will be given a copy of the school's visitor information leaflet which contains essential information about safeguarding and child protection.

## **Additional guidance for male members of staff**

All male members of staff are reminded that as male staff in a girl's school they must be ever vigilant over protecting themselves from allegations relating to their actions, words or appearance.

Today's society provides a difficult climate for adolescent girls and it is essential that male staff recognise this, in order to protect both their reputations and their jobs.

### **Actions**

Male staff should never touch a student, even in an apparently harmless way: the action may be misconstrued, especially by an adolescent.

Male staff should never remain alone in a room with a student, with the door shut. Always sit across a desk from a student, never by her side. Although it is natural to trust students when you feel you know them well or have known them for a long time, professional reserve must be maintained at all times.

### **Words**

Staff should avoid anything other than professional exchanges with the girls. Discussions about social lives and activities should not arise and on no account should any form of counselling be offered. If in any doubt, it is always good practice to share the content of conversations with an appropriate member of staff.

### **Appearance**

Aside from upholding the school's uniform expectations detailed in the school's dress code, do not comment on how a student looks, her hairstyle or her make-up. If you see a student outside school, dressed up and looking more adult than when in uniform, please make no reference to the fact that you have seen her. If she raises the subject in school, change the subject by making some bland and harmless comment. Comments on their clothes etc. must be avoided at all costs. (Likewise, do not allow the girls to engage in personal remarks with regard to yourself e.g. a haircut, new sweater etc. Simply point out that it is rude to make personal remarks.) Do not engage in personal remarks with regards to your own appearance.

### **General**

- Never take a student alone in your car.
- Think ahead and avoid potentially awkward situations.
- Always be very matter of fact and calm: emotional responses will lead you into difficulties.
- If in any doubt about a situation a written account must be given to the Headteacher at the earliest opportunity.
- If you receive letters, cards or emails etc. from students, never mention it to the student but report it to your line manager immediately.

It is vital that you adopt this guidance for your own protection. Please remember that all allegations must be followed up and are likely to lead to the suspension of the member of staff. This would inevitably be distressing for all involved and should be avoided at all costs.



# Recruitment

The arrangements for recruiting all staff to our school will follow the DfE guidance for safer recruitment best practice in education settings, the prevailing staffing regulations, and guidance from the Disclosure & Barring Service (DBS). St Martin's is a 'specified place' under the definition of Regulated Activity and therefore those that work in our school carry out work that is considered to be Regulated Activity. This means that all staff will be subject to stringent Safer Recruitment best practice including a range of conditions such as satisfactory references and an Enhanced Disclosure and Barring Service (DBS) check to include a Children's Barred List check. Volunteers will be subject to an Enhanced DBS Check but without a Barred List Check as they will be suitably supervised in line with current Government guidance.

A Single Central Record (SCR) will be kept of all vetting checks, which will also include verification of the member of staff's identity, which will be via photographic means (Driving Licence, Passport ID card etc.), also any relevant qualifications and permission to work in the UK for non-EU nationals. In St. Martin's School we will ensure that DBS checks are renewed every three years for all staff, and this will be a condition of service. This full renewal may be waived where the member of staff subscribes to the DBS Update Service and the status check is satisfactory and repeated three yearly.

All staff in Regulated Activity, including teaching and/support staff, must by law be checked against the DBS Children's Barred List prior to their appointment as part of the vetting process, and a separate DBS Children's List check will be made where a DBS Check has been applied for but not returned by the start date for all staff working unsupervised in Regulated Activity. Our school will only use employment agencies that positively vet their supply staff and confirm in writing that DfE / DBS compliant checks have been carried out. Staff joining our school on a permanent or temporary basis will be informed of the CP policy and the school's Child Protection and Safeguarding arrangements as part of induction, as set out above.

Additionally we will also conduct a check of the DfE Prohibitions Order List for all teachers to verify they are not subject to a prohibition order or interim prohibition order or whether they have not attained qualified teacher status (QTS) or that they have had this status removed. Prohibition Orders relate to teacher misconduct cases which may or may not be related to safeguarding matters. Therefore the check of the DfE Prohibitions Order List is in addition to the check of the DBS Barred List. Staff are made aware that relations and associations in school and at home (including online) may have an implication for the safeguarding of students and that if there is a change, staff must inform the school.

The single central record (SCR) will include the status of these checks and date these checks were made and by whom.

**Our school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child or if we have a reason to believe the member of staff has committed one of a number of listed offences and as a result we have removed them from working in Regulated Activity. Such referrals to the DBS equally apply to paid or unpaid staff where we are the employer and also apply where we would have removed that person from Regulated Activity had that person not resigned from our employment.**

# Volunteers

In line with the guidance on safer recruitment from the DfE and the Disclosure & Barring Service (DBS), it is expected that all volunteers will be suitably supervised. Thus volunteers may be subject to an Enhanced DBS Check but without a check of the Children's barred list, as supervised activity does not fall under the definition of Regulated Activity.

Therefore all volunteers will work under the direct management of an established staff member, who is in Regulated Activity and vetted accordingly, and all volunteers will be subject to the same code of conduct as paid employees of our school.

St Martin's will provide volunteers with appropriate induction and volunteers will have a 'job description' pertaining to the volunteering role they are to perform.

The requirements resulting from the Safeguarding Vulnerable Groups Act 2006 equally apply to volunteers, therefore vetting checks will be carried out in line with the statutory duties set out in the Safeguarding Vulnerable Groups Act 2006, which will include complying with the legal requirement to ensure employees are registered with the Independent Safeguarding Authority, and not barred from working with children and young people, before commencing work at St. Martin's.

As noted above, all staff, including volunteers, will be inducted which will include the provision of school policies and procedures, this will include any temporary volunteering staff.

*<sup>3</sup> Regulated Activity is work that a barred person must not do. Work is only considered to be Regulated Activity where it is carried out unsupervised at least once per week or more often, or on four or more days in a thirty day period, or overnight.*

## Physical Intervention and Safe Working Practice

All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with students and their families. Children will be treated with respect and any rewards and sanctions should follow those detailed in our school's Positive Behaviour for Learning Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff should avoid placing themselves in a position where their actions might be open to criticism or misinterpretation. As noted in our Use of Reasonable Force Policy, force may be used to control or restrain children. Restraint or positive handling should only be used as a last resort. Where incidents occur that might otherwise be misconstrued or where it becomes necessary to physically restrain or use force to control a child this may be done so for the following reasons: for their own safety, the safety of others, to prevent a criminal act or to maintain good order and discipline. As per best practice advice such incidents will be recorded and reported to the Headteacher and may be reported to parents as appropriate as per best practice advice. Our Use of Reasonable Force Procedures are in line with prevailing DfE Guidance on the Use of Reasonable Force. Refer to our separate policy on positive handling / restraint and the reasonable use of force. All staff received restraint training and were certificated for this in July 2019.

For their own safety and protection, staff should exercise caution in situations where they are alone with students. If a teacher is alone with a student in a classroom the door should be left open

wherever possible and, at all times, glass visibility panels in doors should be kept clear of obstruction so that there is oversight of the classroom from a communal area (e.g. a corridor).

School staff should also be alert to the possible risks that might arise from contact with students outside of school, including contact when using digital technologies which should be for school purposes only and through school equipment/numbers/digital addresses, not personal equipment / devices or personal numbers, email addresses or other such sites. It is expected that staff will always decline requests from students to be 'friends' on social networking sites. The Headteacher must always be made aware of any such contact or approach from students.

First Aid should only be administered by qualified first aiders and, if it is necessary for the child to remove clothing for this treatment, there should be wherever possible another adult present.

## Complaints/Allegations Made Against Staff

St Martin's takes all allegations made against members of staff seriously. Mechanisms are in place for students, parents/carers and staff to share any concerns that they might have about the actions of any member of our school staff. All such allegations will be dealt with in line with our 'Safeguarding Policy' and must be brought immediately to the attention of the Headteacher, not the Designated Safeguarding Lead (unless that is the same person) in order that the appropriate procedures may be followed. Where the school is not the employer of an individual, the school has the responsibility to deal with allegations. We will take the lead role in any investigations and liaise with the supply agency.

All allegations will be dealt with in line with Part 4 of 'Keeping Children Safe in Education 2021'.

Parents should also be advised of their independent right to make a formal complaint to the Police.

If the allegation concerns alleged abuse by the Headteacher, this again should **not** be brought to the attention of the Designated Safeguarding Lead nor the nominated CP Champion Governor. Any allegation pertaining to the Headteacher **must only** be brought to the attention of the Chair of Governors who will consult with Lambeth's Education Services Lead Officer (LADO) and/or Social Care.

Staff who are formally disciplined for any abuse of students (or who resign before disciplinary action can be instigated) will be notified to the Local Authority, if they are not already part of this process, and must be notified to the Disclosure and Barring Service, for their consideration of possible inclusion on their list of persons barred from working with children and young people.

## Low Level Concerns about Staff Behaviour

### **Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors**

At St Martin's we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay; any concerns about

the Headteacher should go to the Chair of Governors who can be contacted by emailing the Clerk to the Governors' Isie Lancaster.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Headteacher.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Headteacher has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

## Allegations

It is an allegation if the person\* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

### Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

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

If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

## **Cover Teachers and Supply Staff**

Supply teachers face unique difficulties with regards to Safeguarding and at times being falsely accused. Working in a Supply/Cover Teacher role often means that teachers don't have much opportunity to establish a professional relationship with the children in the classroom, and as a result of this, everything from their sense of humour to the topics they discuss can suffer an extra layer of scrutiny from the pupils in their care.

Cover and Supply Teachers are expected to conduct themselves in a professional manner at all times. They need to:

- Have a valid DBS Check
- Read the St Martin's Safeguarding Policy
- Understand how to report an incident
- Know who the DSL and Deputy DSL are

If for some reason, an allegation is made against a Cover or Supply Teacher who has:

- 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 may pose a risk of harm to children.
- Behaves or may have behaved in a way that indicates they may not be suitable to work with children

The allegations will be dealt with appropriately and the relevant parties consulted in accordance with St Martin's policy. Statements will be taken from the parties concerned to ascertain the facts and appropriate action taken.

The Headteacher will immediately contact both the agency concerned and the LADO. St Martin's will continue to support any investigation that is required.

Agencies are expected to be fully involved and co-operate in any enquiries from the LADO, police and/or Children's Social Services.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

### **Concerns About Safeguarding Practices Within the School**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: Advice on Whistleblowing.
- The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

## **Records**

Child Protection records are not available to students or parents due to the confidential nature of the content. Child Protection records are kept by the Designated Safeguarding Lead, separately from educational/student records, and can only be accessed by the Designated Safeguarding Lead or their Deputy, or the Headteacher. Other members of our school's Senior Management Team may have access to certain information on a need to know basis as appropriate.

Where a child moves from St Martin's School, any Child Protection records or files will be forwarded to any receiving school within five days of that new provision being confirmed. The CP file will be sent separately to the student file.

Upon receipt of any request regarding direct access to school documentation on any C.P. file, appropriate steps may be taken to adopt the procedure of not allowing such access without the order of a court.

## **Retention and Destruction**

Current timescales for the retention of Child Protection Records are D.o.B. +35 years after which they should be destroyed.

The general student Records / Files are to be retained for D.o.B. +25 years after which they should be destroyed.

## Policy Adoption, Monitoring and Review

This policy was considered and adopted by the Governing body in line with their overall duty to safeguard and promote the welfare of children as set out in the DfE guidance 'Keeping Children Safe in Education 2021'.

Parents will be issued with a hard copy of this policy on request. This policy will also be made available to parents via the school website.

At St Martin's, the Headteacher will actively evaluate the effectiveness of this policy by monitoring the staff group's understanding and application of the procedures within this policy as part of their overall duty to safeguard children. This may include monitoring the appropriateness of cases referred internally to the Designated Senior Lead Person for Child Protection and whether those cases referred to Lambeth Social Care met their threshold and were taken forward.

## Local Authority contacts

**Lambeth Integrated Referral Hub:** 020 7926 3100  
Out of hours: 0207 926 1000

**Local Authority Designated Officer (LADO): Andrew Zachariades**  
Telephone: 0207 926 4579 / 0772 082 8700 Email: lado@lambeth.gcsx.gov.uk

**Local Authority safeguarding Lead** (early years, primary schools, high schools and colleges): **Marian Bentil Quartey**  
Telephone: 07596955299 Email: mbentil@lambeth.gov.uk

**Education Prevent Officer: Lydia Nixon**  
Telephone: 0207 926 3668 Email: lnixon@lambeth.gov.uk

**Head of Inclusion, Education and Learning: Stuart Boffin**  
Telephone: 0207 926 0296 Email: sboffin@lambeth.gov.uk

**CSE Coordinator Children's Services: Claire McDonald**  
Telephone: 0207 926 0296 Email: CMcDonald@lambeth.gov.uk