

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

A CHURCH OF ENGLAND ACADEMY
Co-ed Sixth Form



SAFEGUARDING AND CHILD PROTECTION POLICY

DATE OF APPROVAL: awaiting Governors approval (December 2022)
DATE TO BE REVIEWED: December 2023

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Christ is at the centre of our Church of England school community where we live, love and learn together within an inclusive and equalities framework, and where students of all faiths and none are welcomed into our Anglican Christian community. In all that we do, we seek to show God's care for our students. 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 is to create a safe, caring, happy and inclusive community underpinned by our Christian values of service, compassion, justice and perseverance and our motto CARITATE ET DISCIPLINA - WITH LOVE AND LEARNING which come from the story of St Martin of Tours. Central to this is our school Bible verse from St Paul's first letter to the Corinthians.

Love is patient, love is kind. It does not envy, it does not boast, it is not proud. It does not dishonour others, it is not self-seeking, it is not easily angered, it keeps no record of wrongs. Love does not delight in evil but rejoices with the truth. It always protects, always trusts, always hopes, always perseveres. Love never fails. 1 Corinthians 13:4-8

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 worries 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, 2022. 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 (DT CLA). 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.

Four categories of child abuse

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 disinhibiter 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 alone².

² *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) and Child Criminal Exploitation (CCE)

Both CSE & CCE are forms of abuse and occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity under the age of 18. The abuse may be in exchange for something the victim needs or wants (financial, increased status) The abuse may be, one off, a series of incidents over time and range from opportunist to complex organised abuse. This may involve force and/or enticement based methods of compliance. 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.

Sexual Violence and Sexual Harassment

At St Martin's there is a zero tolerance approach to Sexual Violence and Sexual Harassment, and that failure to do so can:

- Lead to a culture of unacceptable behaviour and in the worst case scenario, a culture that normalises abuse
- Recognising that even if there are no reports, it doesn't mean it's not happening
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them (paragraph 446 KCSIE 2022)
- Children with SEND are 3 times more likely to be abused than their peers (paragraph 448 KCSIE 2022)

Harmful Sexual Behaviour (HSB)

HSB can occur online and/or face-to-face and can also occur simultaneously between the 2. Both the ages and stages of development of the children are critical factors.

At St Martin's the DSL and the Deputy have a good understanding of HSB. Children displaying HSB have often experienced their own abuse and trauma, and it's important they're offered appropriate support.

Preventing abuse (paragraph 458 KCSIE 2022), the DSL will:

- Discuss the local response to Sexual Violence and Sexual Harassment with police and local authority children's social care colleagues to prepare the school's or college's policies (especially the Child Protection Policy) and responses, and
- Be confident that they know what local specialist support is available to support all children involved (victims and alleged perpetrators) in Sexual Violence and Sexual Harassment, and be confident as to how to access this support

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms 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 2022.

Child on Child Abuse (Peer on Peer Abuse)

Child-on-Child Abuse is the new name for Peer-on-Peer Abuse. This section has also been moved ahead of the section on Child Criminal Exploitation (paragraph 32) Added that abuse in intimate relationships between children is sometimes known as 'teenage relationship abuse' (paragraph 35 KCSIE 2022).

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

- Bullying (including cyberbullying);
- Physical abuse such as 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.

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.

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.

Children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a professional curiosity; and speaking to the Designated Safeguarding lead (DSL) (paragraph 19 KCSIE)

If staff have a Safeguarding concern/allegation about another staff member (including supply staff, volunteers and contractors) that doesn't meet the harm threshold, then they should share it in accordance with your low-level concerns policy (paragraph 73 KCSIE)

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. In cases of sexting we follow the guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: '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.

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

The definition of Domestic Abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. Domestic Abuse has a significant impact on children:

- As a victim in their own right
- Witnessing the impact that abuse has on the non abusive parent; and
- As they may also be forced to participate in the abusive behaviour

At St Martin's School we are 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.

- Children who witness Domestic Abuse are also victims
- Witnessing domestic abuse can have a lasting impact on children
- Children can be victims, and perpetrators, in their own relationships too
- The abuse can be physical, sexual, financial, psychological or emotional

Extra-familial harms can include Sexual Harassment and Domestic Abuse in their own intimate relationships (teenage relationships) (paragraph 23 KCSIE 2022)

Added to the definition of abuse that harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of Domestic Abuse on children (paragraph 26 KCSIE 2022)

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 2022)

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.

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 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 (2022) 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 With Special Educational Needs and Disabilities

The Child Protection policy reflects that children with Special Educational Needs or Disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so. See paragraph 198 KCSIE 2022).

Children and young people with SEND 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 SEND 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 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 CPDs

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.

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.

We will help 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 2020 (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.

The Designated Safeguarding Lead is: Mrs Suganthy Wilson

The Deputy Designated Safeguarding Lead is: Ms Baird

The Designated Teacher for Children Looked After is: Ms Baird

The Lead Governor for Safeguarding is: Ms Alicia Walker

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 2022)

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, SEND 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 (2022) 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.

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.

Confidentiality and Anonymity

- Staff shouldn't promise confidentiality as it might be in the victim's best interest to seek advice and guidance

- If a victim asks the school not to tell anyone about the sexual violence or Sexual Harassment, there's no definitive answer. This is because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

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

Regarding anonymity, schools should:

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

Discipline and the Alleged Perpetrator

The DSL should take the lead role:

- You can take disciplinary action whilst other investigations are ongoing e.g. by the police
- The fact another body is investigating/has investigated an incident doesn't (in itself) prevent you from coming to your own conclusion about what happened and impose a penalty accordingly. This is a matter for you and you should consider it on a case-by-case basis

You should consider whether:

- Taking action would prejudice an investigation and/or subsequent prosecution liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable/irrational for you to reach your own view about what happened
- You can, and should, take disciplinary action and still provide support at the same time if necessary

Working With Parents and Carers

The Designated Safeguarding lead will:

- In most cases engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of Sexual Violence (this might not be necessary in relation to Sexual Harassment, but decided on a case-by-case basis). The exception is if there's reason to believe informing a parent or carer will put the child at additional risk

- Think carefully about what information you provide about the other child involved, and when. Make sure you work with relevant agencies to ensure your approach to information sharing is consistent
- Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress
- Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision

Safeguarding Other Children

At St Martin's we will:

- Consider supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration
- Do all that is possible to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed
- Social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- Consider school transport as part of your risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s)
- Ensure policies, processes and curriculum constantly under review to protect all children
- Reports of Sexual Violence and/or Harassment may:
 - Point to environmental/systematic problems that could be addressed by updating policies, processes and the curriculum
 - Reflect wider issues in the local area
- It should be clear to all victims that the law on Child-on-Child abuse is there to protect them, not criminalise them (paragraph 468 KCSIE 2022)
- Consider intra familial harms and any necessary support for siblings following a report of Sexual Violence and/or Harassment (paragraph 482 KCSIE 2022)
- Schools, as relevant agencies, should be part of discussions with statutory Safeguarding partners to agree to the levels for the different types of assessment as part of local arrangements (paragraph 492 KCSIE 2022)
- If there are delays in the criminal process, it will be important for the DSL to work closely with the police (and other agencies as required) whilst protecting children and/or taking disciplinary measures against the alleged perpetrator(s) - this is to make sure the school's actions don't jeopardise the police investigation.
- Any questions about the investigation, contact the police (paragraphs 522 and 523 KCSIE 2022)
- When supporting the victim, you should:
- Regularly review decisions and actions, and update relevant policies with lessons learnt
 - Look out for potential patterns of concerning, problematic or inappropriate behaviour, and where you identify a pattern, decide on a course of action
 - Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether extra teaching time and/or staff training could minimise the risk of it happening again

Children who have experienced Sexual Violence can display a wide range of responses, so schools should remain alert to the possible challenges of detecting those signs and show sensitivity to their needs (paragraph 533 KCSIE 2022)

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 and Trustees

In line with the provisions set out in the DfE guidance 'Keeping Children Safe in Education, 2022' the Governing Board and Trustees will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and the Public Sector Equality Duty (PSED) (paragraph 82 KCSIE 2022) and challenge the school's Senior Leadership Team on the delivery of this policy and monitor its effectiveness. Governors and Trustees 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, Trustees 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: please see our 'Allegations Against Staff Policy'.

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 and Trustees.

Training

Whole school in-service training will be organised for Staff, Trustees and Governors at least every 2 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 summary of the Government guidance 'Keeping Children Safe in Education, 2022' Annex A 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.

KSCIE 2022 explains in more detail that in relation to Safeguarding:

Human Rights Act 1998: being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to schools under the European Convention on Human Rights (ECHR) (paragraph 85 KCSIE 2022)

Equality Act 2010: governing bodies and proprietors should carefully consider how they're supporting their pupils and students regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race) under the Equality Act (paragraph 88 KCSIE 2022)

Public Sector Equality Duty (PSED): you can take positive action to deal with particular disadvantages affecting pupils (where you can show it's proportionate). This includes making reasonable adjustments for disabled pupils. You could consider using it, for example, to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment (paragraph 89 KCSIE 2022)

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.

³ *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 'Allegations Against Staff 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.

If staff have a Safeguarding concern/allegation about another staff member (including supply staff, volunteers and contractors) that doesn't meet the harm threshold, then they should share it in accordance with St Martin's low-level concerns policy (paragraph 73 KCSIE 2022)

All allegations will be dealt with in line with Part 4 of 'Keeping Children Safe in Education 2022'.

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.

Greater detail on the procedures for managing allegations against staff are to be found in our separate policy pertaining to this area as outlined above and the procedures set out in that policy should be followed in these circumstances.

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. 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.

When 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 following the school's procedure.

Upon receipt of any request regarding direct access to school documentation on any CP 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 and Trustees 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 2022'.

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): **Deborah Carter**
Telephone: [07935 602437](tel:07935602437) Email: dcarter@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

