FRANCIS HOLLAND SCHOOLS TRUST

Name of Policy	**Safeguarding & Child Protection**
Author	SLT
Committee for Review & Approval	Education (also reviewed annually by full Council)
Date of Last Revision	September 2020
Date of Committee Approval	Autumn 2020
Date of Council Review & Approval	
Date of Next School Review	Summer 2021
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Date of Next Council Review & Approval	Spring 2021
Regulation Number	Part 3 7(a)(b)
Regulation Description	Safeguard & promote the welfare of pupils at the school and have regard to any guidance issued by the DfE and the DBS

This policy applies to both Sloane Square and Regent's Park, and to the EYFS as well as junior and senior schools. Where there are differences in procedures between the schools this has been clearly highlighted.

Availability of this document:
Copies of this document may be downloaded from our website www.francisholland.org.uk/1499/policies, Firefly, or are available on request from the school office: Francis Holland School (Sloane Square), 39 Graham Terrace, London SW1W 8JF or Francis Holland School (Regent's Park), 39 Ivor Place, London NW1 6XR.

Designated Safeguarding Leads (DSLs)	
Sloane Square	**Regent's Park**
DSL: Jenny Bushell – Deputy Head Pastoral Ext: 227 Email: jenny.bushell@fhs-sw1.org.uk	DSL: Colette Mahieu – Pastoral Deputy Head Ext:216 Email: colette.mahieu@fhs-nw1.org.uk
Deputy DSLs: Paul Jeanes – Senior Deputy Head Ext: 201 Email: paul.jeanes@fhs-sw1.org.uk Suzy Dixon – Head of Junior School Ext: 246 Email: suzy.dixon@fhs-sw1.org.uk	Deputy DSL: Maria Merrigan – Head of PSHE Ext: 212 Email: maria.merrigan@fhs-nw1.org.uk
DSL trained: Julia Banks/Rachel Sawyer – Joint Heads of Sixth Form Ext 216 Email: headofsixthform@fhs-sw1.org.uk	TBC new appointment
LOCATION OF KEY INFORMATION WITHIN THE POLICY	
If a child has reported a safeguarding issue to you: See paragraph 5.4 onwards	
If an allegation is made about a member of staff: See paragraph 6	
If you would like to report a safeguarding concern: See paragraph 5.12 onwards	
For a full list of useful contact details: See paragraph 11	

Section 1 – Safeguarding Policy 1. Policy Statement

1.1 Safeguarding and Child Protection Policy

1.1.1 The safety and well-being of all our pupils at Francis Holland School are our highest priority. Our aim is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety. We expect respect, good manners, and fair play to be shown by everyone so that every pupil can develop her full potential and feel positive about herself as an individual. All pupils should care for and support each other.

1.1.2 This Policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the School. They have been prepared in compliance with, and with regard to:

- The Education Acts

- *Education (Independent Schools Standards) Regulations* 2014 (as amended from time to time)
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- The Children Act 2004
- *What to do if you're worried a Child is being Abused* March 2015
- *Working Together to Safeguard Children* March 2018 (A guide to inter-agency working to safeguard and promote the welfare of children)
- *Keeping Children Safe in Education* September 2020
- *Disqualification under the Childcare Act 2006* August 2018
- *Information Sharing: advice for practitioners providing safeguarding services* July 2018
- DBS Referrals Guidance (as may be amended from time to time)
- *Independent Schools Inspectorate Handbook* September 2019– the regulatory requirements (and as amended)
- *Teacher misconduct: regulating the teaching profession* September 2018 (and related guidance)
- *Use of Reasonable Force in Schools* July 2013
- *Information Commissioner's Office Data Sharing Code of Practice* May 2011
- *Preventing and Tackling Bullying* July 2017
- *Statutory Framework for the Early Years Foundation Stage (EYFS)* February 2018 [EYFS only]
- *Prevent Duty Guidance, Channel Guidance,* and *Prevent Departmental Advice,* 2015

1.1.3 The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its pupils (and staff) from harm, and to co-operate with other agencies in carrying out those duties and responding to safeguarding concerns.

1.1.4 This Policy also takes into account the inter-agency procedures and practice of the Local Safeguarding Children Partnership (LSCP), comprising Hammersmith & Fulham Council, Kensington & Chelsea Council, Westminster Council, Central West Basic Command Unit and North West London Collaboration of Clinical Commissioning Groups.

1.1.5 This Policy is addressed to all members of staff and volunteers at the School (temporary and permanent). Adherence to this Policy is mandatory for **all** staff and volunteers and its use is not subject to discretion. This Policy applies whenever staff or volunteers are working with pupils, including where this is away from the School, for example at another institution, on school visits and trips, as well as sporting and cultural activities.

1.1.6 This Policy is available to all parents, staff and volunteers on the School's website. A paper copy of this Policy is also available to parents upon request to the School office.

1.1.7 Pupils are taught about safeguarding both on and offline, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience; and are made aware of this Policy through the PSHE programme and the ICT/computing syllabus, and other means of sharing information appropriate to their age and understanding, within a broad and balanced curriculum.

2. Aims

2.1 Our aims are to:

2.1.1 Create an environment in the School which is safe and secure for all pupils.

2.1.2 Encourage our pupils to establish satisfying relationships within their families, with peers and with other adults.

2.1.3 Encourage children to develop a sense of autonomy and independence.

2.1.4 Work with parents to build their understanding of and commitment to the welfare of all pupils.

2.2 In order to fulfil these aims the Head will take the necessary steps to ensure that:

2.2.1 All staff (including supply and temporary staff) and volunteers receive training in Safeguarding Children as part of their induction. This includes the School's safeguarding policy and procedures (which incorporate the Staff Code of Conduct), the identity and role of the designated safeguarding lead(s), the Whistleblowing Policy and relevant sections of *Keeping Children Safe in Education*.

2.2.2 All staff, volunteers and the Head are trained in child protection (including Prevent awareness and e-safety training) regularly (in line with LSCP requirements), and receive safeguarding and child protection updates as required, but at least annually. The Designated Safeguarding Lead(s) receive(s) the required updated child protection and Prevent training at least every two years (as set out in Annex B of *Keeping Children Safe in Education*).

2.2.3 The School adheres to the Trust's Recruitment, Selection and Disclosure Policy (available from the School on request), which complies with the *Independent School Standards Regulations*. Appropriate supervision arrangements are put in place if staff start work before their DBS disclosure has been obtained.

2.2.4 The School carries out the mandated checks on the suitability of all people who serve on our School Governing Council in accordance with Trust policy.

2.2.5 Where the Trust ceases to use the services of any person (staff (including agency staff), peripatetic teacher, volunteer or any other person) or the person resigns or otherwise ceases to provide his or her services because it is considered that the person may be unsuitable to work with children, a referral will be made to the Disclosure and Barring Service (DBS) in accordance with the procedural guidance at https://www.gov.uk/guidance/makingbarring-referrals-to-the-dbs (contact: PO Box 181, Darlington, DL1 9FA. Tel: 01325 953795, email dbsdispatch@dbs.gsi.gov.uk). In cases involving teaching staff, the School will also decide whether to refer the matter to the Teaching Regulation Authority (TRA) to consider prohibiting the individual from teaching.

2.3 This Policy is compatible with and meets all applicable requirements of the LSCP. The School ensures that it has positive communication with the LSCP to ensure compliance with local protocol and access to relevant support. The LSCP can be contacted through the Local Social Services Department (Children's Services) "Social Services". Their contact details are set out in paragraph 11.3 below.

3 Designated Safeguarding Lead (DSL)

3.1 The Trust has appointed Designated Safeguarding Leads and deputies to contact in their absence. The Designated Safeguarding Leads are members of the School's Senior Leadership Team with the necessary status and authority to take lead responsibility for child protection matters. This responsibility cannot be delegated. The School will ensure that the Designated Safeguarding Leads are given the time/cover, funding, training, resources and support to fulfil their role**.**

The Designated Safeguarding Leads and their Deputies are:

Designated Safeguarding Leads (DSLs)	
Sloane Square	**Regent's Park**
DSL: Jenny Bushell – Deputy Head Pastoral Ext: 227 Email: jenny.bushell@fhs-sw1.org.uk	DSL: Colette Mahieu – Pastoral Deputy Head Ext:216 Email: colette.mahieu@fhs-nw1.org.uk
Deputy DSLs: Paul Jeanes – Senior Deputy Head Ext: 201 Email: paul.jeanes@fhs-sw1.org.uk Suzy Dixon – Head of Junior School Ext: 246 Email: suzy.dixon@fhs-sw1.org.uk	Deputy DSL: Maria Merrigan – Head of PSHE Ext: 212 Email: maria.merrigan@fhs-nw1.org.uk
DSL trained: Julia Banks/Rachel Sawyer – Joint Heads of Sixth Form Ext 216 Email: headofsixthform@fhs-sw1.org.uk	TBC new appointment

The Designated Safeguarding Leads will ensure that there is always cover for their role (including for any out of hours/out of term activities) and that arrangements for cover are communicated clearly to staff.

The Designated Safeguarding Leads will:

3.1.1 be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the guidance and regulations set out at paragraphs 1.1.2;

3.1.2 refer cases of suspected abuse or allegations to the local Social Services Department and/or the police in accordance with LSCP procedures, and work with other agencies in line with *Working Together to Safeguard Children;*

3.1.3 receive *Prevent* awareness training; provide advice and support, and make appropriate referrals through the *Channel* programme;

3.1.4 ensure that they are aware of the latest national and local guidance and requirements and will keep the Head, staff and volunteers informed as appropriate;

3.1.5 receive appropriate training in child protection matters and interagency working, to include both national and local bodies, at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, in order to keep up with developments relevant to the role;

3.1.6 ensure that the Head, staff and volunteers have access to and understand their role as appropriate in the child protection procedures, including but not limited to part-time staff, supply staff, peripatetic staff, newly appointed staff, newly qualified staff, gap year students, volunteers, catering staff, cleaning staff and caretakers;

3.1.7 act as a source of advice and support within the School and co-ordinate action regarding referrals in relation to both children and allegations against staff.

3.2. Creating a Culture of Safeguarding

3.2.1 The School recognises that safeguarding covers much more than child protection and so this Policy incorporates the staff Code of Conduct, and will operate in conjunction with other related policies and procedures, covering areas including Whistleblowing, Equal Opportunities; Health and Safety; First Aid; Educational Visits; school security; Anti-Bullying; Behaviour Management; Drugs, Alcohol and Tobacco; Information Sharing; the safe use of ICT and social media, and preventing radicalisation and violent extremism. Such policies are available from the School on request.

3.2.2 The School takes seriously its responsibility to promote and nurture the mental health and wellbeing of all its pupils and staff. This is reflected in its policies and procedures for pastoral care and the School's PSHE programme.

3.2.3 'Safeguarding' is broader than 'child protection'. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the welfare of children. It is recognised that safeguarding and promoting the welfare of children includes:

- Protecting children from maltreatment
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The School recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and

neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. We have a range of measures in place to identify issues and support pupils who may require early help, these include access to a counselling service, safeguarding advice posters displayed prominently around the school, and regular meetings between Heads of Section and the DSL and between the Head and the DSL. Safeguarding issues and monitoring is a feature on all staff meeting agendas.

3.2.4 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our pupils should make sure that their approach is child-centred (that is, that they consider at all times what is in the best interests of the child).

3.2.5 As well as ensuring that the School's policies and procedures support its safeguarding responsibilities, the School will work with pupils and their families, and contribute to interagency working, in line with the statutory guidance *Working Together to Safeguard Children*. This includes providing a co-ordinated offer of early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

We are committed to working in partnership with parents, Social Services Departments and other outside agencies and professionals, to continuously develop and improve the safeguarding culture within our School.

Having these safeguards in place not only protects and promotes the welfare of children but also it enhances the confidence of our staff, volunteers, parents/carers and visitors.

3.2.6 The School has systems to:

- Prevent unsuitable people working with pupils;
- Identify pupils who are at risk of and/or are likely to suffer significant harm and take appropriate action, and promote the welfare of pupils in need of additional support;
- Promote safe practice and challenge poor and unsafe practice;
- Protect students and staff from online risks, which include e-safety education and training, policies and procedures governing the use of IT, filtering and monitoring systems, and procedures to manage any incidents that occur;
- Deal with issues of confidentiality, information sharing and consent;
- Ensure that staff do not, through their actions, place **pupils** at risk of harm, or place themselves at risk from an allegation of harm (by providing guidance on areas such as 1:1 tuition, sports coaching, conveying by car, inappropriate electronic communication).

3.2.7 The School encourages the pupils in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages pupils to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.

3.2.8 While the primary requirement is to notify the LADO[1]/Children's Services (or the local Prevent Officer, as appropriate), the School will also notify the Governor with responsibility for Safeguarding.

Schools are encouraged to contact the Governors in any other case where guidance or advice is felt to be needed.

3.2.9 All staff are required to adhere to the *ICT Acceptable Use Agreement*, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.

3.4 Early Years Foundation Setting (Sloane Square only)

3.4.1 This Policy applies to the School's provision for the Early Years Foundation Setting ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with responsibility for safeguarding within this setting are set out at paragraphs 3.1 and 11.1.

3.4.2 Throughout the setting all persons in the EYFS are aware of the ICT Acceptable Use Agreement on the use of mobile phones and camera and EYFS procedures go beyond this; staff working in the EYFS are not permitted to use their mobile phone in front of pupils nor to take photographs of pupils on their mobile phone. School cameras are not to be taken home. The EYFS iPad is used for taking photographs of the pupils, as well as for maintaining assessment records through the Teachermate EYFS Profiles software.

3.4.3 Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behaviour, deterioration in wellbeing, physical indications, or comments which give cause for concern), and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children (EYFS Statutory Framework 3.6).

3.4.4 Supervision arrangements ensure that pupils are usually within sight and hearing of staff and always within sight or hearing of staff. Staff ratios are in line with guidance from the Statutory Framework (3.35) and risk assessments, both on-site and off-site, further promote the safety and well-being of EYFS pupils.

3.5 Children at potentially greater risk of harm

3.5.1 Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

[1] Local Authority Designated Officer(s) for Child Protection. Each local authority should have designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children. The term 'LADO' in this Policy is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology individual LSCPs may use.

3.5.2 Looked After Children

The School will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by the local authority.

3.5.3 Private Fostering

Private Fostering occurs where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home. If a member of staff becomes aware that a pupil may be in a Private Fostering arrangement, they should raise this in the first instance with the Designated Safeguarding Lead. The School will then notify the local authority of the circumstances.

3.5.4 Children with a Social Worker

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

3.5.5 Children requiring mental health support

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. The school will ensure that clear procedures are in place to identify potential mental health problems as well as to support such children, and ensure that staff are aware that mental health problems may be an indicator of safeguarding concerns.

Section 2 – Safeguarding Procedures

4. Responding to Safeguarding and Child Protection Concerns

4.1 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. School staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

4.2 Any concern, allegation or incident of abuse must be referred to the Designated Safeguarding Lead (unless the concern relates to the DSL – see paragraph 6.2). All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss this with the Designated Safeguarding Lead.

4.3 If staff have concerns about a child (as opposed to a child being in immediate danger or at risk of harm – see para 4.4 below) they will need to decide what action to take. All staff should be prepared to identify children who may benefit from early help, that is, support as soon as a problem emerges. Such problems should be discussed in the first instance with the Designated Safeguarding Lead. The early help process may also involve sharing information with other professionals and contributing to an early help assessment.

4.4 If a child is in immediate danger or at risk of harm, this must be reported to the Designated Safeguarding Lead, who will make a referral to children's social care and/or the police immediately (see section 5.12). It is not the responsibility of the School to investigate suspected or alleged abuse; this is the role of the Police and Social Services.

4.5 What is Child Abuse and what are the signs of abuse?

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the Internet). They may be abused by an adult or adults or another child or children. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

All School staff members should be aware of the signs of abuse, neglect and radicalisation so that they are able to identify cases of children who may be in need of help or protection.

The following may help staff to be aware of possible signs of abuse - There are further sources of information such as the NSPCC website. However such lists are not exhaustive - if staff members are unsure they should always seek advice and report concerns even where signs/indicators are not present. Staff should also be alert to behaviours or circumstances that put children in danger, such as drug taking, alcohol abuse, self-harm, truanting, cyber bullying and sexting, as well as 'contextual' safeguarding – that children can be at risk of abuse or exploitation in multiple situations including outside school and outside their family

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

Signs may include:

- Unexplained injuries/burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

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

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

Signs may include:

- Excessive overreaction to mistakes
- Continual self-deprecation
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

4.5.3 Sexual abuse - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at or the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment.

Signs may include:

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or school performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

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

Signs may include:

- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

4.5.4 Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, gifts money or in some cases, simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse, and that abuse it not always physical. If staff are concerned about a pupil in relation to CSE then they should report the concern to the Designated Safeguarding Lead.

4.5.5 Child criminal exploitation (CCE)

CCE 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 physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people. If staff are concerned about a pupil in relation to CCE then they should report the concern to the Designated Safeguarding Lead.

4.5.6 Female Genital Mutilation (FGM) - There is a range of potential indicators that a child or young person may be at risk of FGM, For example:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including those from Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM include:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs

- Mentioning something to somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

It is mandatory for staff to report to the police cases where they discover that an act of FGM appears to have been carried out. If staff are otherwise concerned about a pupil in relation to FGM then they should report the concern to the Designated Safeguarding Lead.

4.5.7 Sexting is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Pupils are taught about sexting as part of their e-safety education. The School takes incidences of sexting extremely seriously, and deals with them in accordance with safeguarding and child protection procedures, including reporting to the police.

4.5.8 Peer on Peer Abuse Staff should also recognise that children are capable of abusing their peers. This is most likely to include, but is not limited to: bullying (including cyber bullying), gender based violence/sexual assaults, sexting and upskirting. Upskirting is now a criminal offence and typically involves taking a picture under a persons' clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Peer on peer abuse should be recognised as such and never be tolerated or passed off as 'banter' or 'part of growing up'. Pupils are taught to recognise such behaviours as abuse as part of the School's approach to safeguarding education. Any allegation of such abuse will be promptly and thoroughly investigated, and treated according to its gravity, which may include referral to children's social care or the police. Victims will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. Staff should remember that in instances of peer-on-peer abuse perpetrators are also victims.

4.5.9 Who are the abusers? Abusers might be parents or carers, siblings or members of the extended family, neighbours, teachers, peers, strangers; in short, an abuser could be anyone.

4.5.10 Missing Children

A child going missing from school is a potential indicator of abuse and neglect. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly in line with this policy. Class Teachers and Form Tutors are expected to review the attendance record of the pupils for whom they are immediately responsible on a regular basis and to raise any concerns with the DSL. The DSL will consider and agree an appropriate course of action in conjunction with relevant pastoral leaders. The nature of action to be taken will depend on the age of the child and the individual circumstances. Any concern and action taken should be recorded in writing and a note placed on the pupil file. Refer to the Attendance Policy for further information.

4.6 Mental Health

All staff should also be 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, they should report this to the Designated Safeguarding Lead.

5. Responding to Disclosures of Abuse

5.1 Children are more likely to be abused by someone they know and trust than by a stranger. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always take action in the best interests of the child.

5.2 Staff and volunteers should make themselves available to listen and demonstrate to the pupil that what they are saying is being taken seriously and without criticism and should respond in a supportive, calm manner and avoid asking detailed or leading questions (see 5.5.3). The role of the staff or volunteer is to listen, record and report; not to investigate. Staff and volunteers should take care to ensure that their behaviour and actions do not place pupils or themselves at risk of harm.

5.3 If a pupil reports abuse from another pupil or pupils, staff should follow the procedures in this section. All children involved, whether a potential perpetrator or victim, will be treated as being 'at risk'. The Designated Safeguarding Lead will liaise with local agencies in relation to handling any such cases which arise. A bullying incident will be regarded as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. See the Anti Bullying Policy.

5.4 <u>Immediate Response</u>

If a disclosure is made, the member of staff or volunteer **should**:

5.4.1 allow the pace of the conversation to be dictated by the pupil;

5.4.2 ask open questions which encourage the pupil to talk such as "can you tell me what happened?"

5.4.3 accept what the pupil says and do not ask for further detail;

5.4.4 acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously;

5.4.5 note carefully any clearly visible external signs of possible injury or neglect (but note paragraph 5.5.4 below);

5.4.6 reassure the pupil that they have done the right thing, that it is not their fault, and explain whom you will have to tell (the Designated Safeguarding Lead) and why.

5.5 <u>The member of staff or volunteer **should not**</u>:

5.5.1 burden the pupil with guilt by asking questions such as "why didn't you tell me before?"

5.5.2 interrogate or pressure the pupil to provide information; 5.5.3 ask any potentially leading questions, e.g. ask 'what happened then' rather than 'did he hit you?';

5.5.4 undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect, or photograph any part of the child;

5.5.5 criticise the alleged perpetrator, this may be someone they love;

5.5.6 promise confidentiality (see paragraph 5.6 and 5.7);

5.5.7 make promises that they cannot keep such as "I'll stay with you all the time" or "it will be all right now";

5.5.8 put words in the child's mouth (i.e. finish their sentences);

5.5.9 jump to conclusions or speculate about what happened or might have happened, or make accusations;

5.5.10 show an overly emotional reaction, such as expressing disgust, shock or disbelief;

5.5.11 attempt to investigate the allegations.

5.6 If a pupil confides in a member of staff or volunteer and requests that the information is kept secret, staff/volunteers ***must not*** *make promises about confidentiality.* Staff must tell the pupil sensitively that they have a responsibility to tell the named Designated Safeguarding Lead (see paragraph 3) so that the child can be helped to stay safe and feel better. A pupil who is insistent upon confidentiality should be referred to an external source (details are given on notice boards around the school).

5.7 In every case, the member of staff/volunteer should consider whether the pupil is able to provide consent for the information to be shared and if so, seek to obtain that consent. If the pupil does not consent, the member of staff/volunteer should explain that they need to share the information with the Designated Safeguarding Lead and reassure them that the information will *only be disclosed* to other people who *need to know.*

5.8 The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm. The School has age appropriate systems in place for children to express their views and give feedback so that their wishes or feelings will be taken into account when determining what action to take and what services to provide. However the child's wishes or feelings cannot override the duty to refer suspected abuse to children's social care or police.

5.9 The School will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.

5.11 <u>Recording Information</u> Staff/volunteers should:

5.11.1 make brief notes at the time or immediately afterwards, which record the date, time, place and context of the disclosure or concern, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation. Notes must be signed and dated;

5.11.2 clearly distinguish between fact, observation, allegation and opinion;
5.11.3 record any observed injuries and bruises;
5.11.4 note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into "proper terms");
5.11.5 complete a Safeguarding Concern Form/ written report, attach any original notes and pass them to the Designated Safeguarding Lead;
5.11.6 appreciate that their records may be used in criminal proceedings or disciplinary investigations.

5.12 Reporting Concerns

5.12.1 Any concerns about pupils must be discussed with the Designated Safeguarding Lead (or in their absence the Deputy Designated Safeguarding Lead) as soon as possible and at latest by the end of the school day.

5.12.2 Where the disclosure identifies a safeguarding issue, the Designated Safeguarding Lead will report the disclosure to the local Social Services Department within 24 hours and where relevant (as outlined in paragraph 1.2.8) will notify the Legal Department at Trust Office. The Head shall be kept informed. In the most serious cases the police shall be contacted.

5.12.3 The School's procedures differentiate between safeguarding children who have suffered significant harm and those who are in need of support from one or more agencies. In cases where a child is not suffering or at risk of suffering serious harm, but rather in need of additional support, an inter-agency assessment will be undertaken to determine the most appropriate action.

5.12.4 Whilst the Designated Safeguarding Lead will usually decide whether to make a referral**, anyone can refer their concerns to children's social care directly** (see section 9 below).

5.12.5 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.**

6 Allegations against staff

6.1 Schools must follow the procedures for handling allegations made against staff (including supply staff) and/or volunteers set out in Part 4 of *Keeping Children Safe in Education* 2020. The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.

6.2 Where a safeguarding-related allegation or cause for concern is made against any member of staff or volunteer (including the Designated Safeguarding Lead), the matter should be reported immediately to the Head (unless the allegation relates to the Head). The Head should **not speak** to the member of staff who is the subject of the allegation at this point. In the absence of the Head the allegation should be reported to the Chair of Governors (who may be contacted via the Bursary).

6.3 Where a safeguarding related allegation or cause for concern is made against the Head, the matter should be reported immediately to the Chair of Governors (who may be contacted via the Bursary) without informing the Head.

6.4 **In all cases immediate contact should be made with the LADO** to discuss the allegation. A decision as to how to proceed and eventually whether or not to suspend a member of staff or volunteer will be taken by the Head following consultation with the LADO (and, in the most serious cases, the police). In borderline cases discussions with the LADO can be held informally and without naming the school or individual. Suspension is not an automatic response and the decision will be taken according to the circumstances of each particular case. The decision as to whether or not to suspend the Head is taken by the Governing Council alone (having consulted the relevant authorities).

6.5 In considering the available options, including redeployment of the member of staff or volunteer, the LADO and the Head will ensure that their primary concerns are the safety and wellbeing of the pupils, together with the need for a full and fair investigation which will be led by the LADO or the police.

6.6 As noted in para. 2.2.6 above, where we cease to use the services of any person (staff member (including agency staff), peripatetic teacher, volunteer or any other person) or the person resigns or otherwise ceases to provide his or her services because it is considered that the person may be unsuitable to work with children, a referral will be made to the DBS. In cases involving teaching staff, the School will also decide whether to refer the matter to the Teaching Regulation Authority (TRA) to consider prohibiting the individual from teaching.

6.7 Where required to do so, we will provide information requested by the DBS or TRA in respect of a member of staff or volunteer in accordance with our legal duty.

6.8 Communications with the School community about safeguarding-related allegations shall only be made following consultation with the LADO and any investigating authorities. There are restrictions on the reporting or publishing of allegations against teachers (which apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case). Every effort will be made to maintain confidentiality and guard against unwanted publicity. The Legal Department will advise on the statutory reporting restrictions on publication of details of allegations.

6.9 If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

7. Roles and Responsibilities

7.1 Every member of staff and every volunteer (including governors) who assists the School should:

7.1.1 protect pupils from abuse

7.1.2 follow the Trust's safeguarding policy and procedures, and read at least Part 1 and Annex A of *Keeping Children Safe in Education 2020*, including updates to this document, annually. School leaders and staff who work directly with children are also required to read Annex A of KCSIE 2020.

7.1.3 know how to access and implement the procedures

7.1.4 know the identity of the School's Designated Safeguarding Lead/s and who to speak to in the absence of the Designated Safeguarding Lead/s

7.1.5 report all safeguarding concerns to the Designated Safeguarding Lead (subject to paragraphs 5.12.4, 6.2 and 6.3 of this Policy)

7.1.6 keep a record of any safeguarding concern, conversation or incident (in accordance with paragraphs 4.2 and 5.11 of this Policy)

7.1.7 undertake appropriate training as detailed in 2.2.2 above.

8. Referring Concerns to Social Services

8.1 The decision to make a referral which could activate a child protection investigation, and the issue of gaining parental consent, are serious matters and require careful judgement. These decisions should usually only be taken by the Head or by the Designated Safeguarding Lead, who will liaise with the Head as appropriate, following consultation with Social Services. In cases of serious harm the police will be informed from the outset. However, anyone can refer their concerns to children's social care directly (see section 9 below).

8.2 In the case of concerns about a pupil being at risk of radicalisation, school staff should use their professional judgement and act proportionately. This may include reporting to the Designated Safeguarding Lead and making a referral through the *Channel* programme.

8.3 The Head and/or Designated Safeguarding Lead should notify the Governor with oversight of Safeguarding of any referral made to Social Services or the police.

8.4 Subject to 8.1 above and the advice of Social Services, the consent of parents should be obtained before making a formal referral, unless to do so could place the child at risk of significant harm.

8.5 In accordance with paragraph 5.12.2 of this Policy, where the disclosure relates to actual abuse or the suspicion of abuse, the Designated Safeguarding Lead will report the disclosure to Social Services within 24 hours.

8.6 In the event of the School making a referral to Social Services, it should agree with the recipient of the referral what exactly the child and parents will be told, by whom and when. The Designated Safeguarding Lead should ask to be kept informed of the timing of the strategy discussion between Social Services and the police, which will decide whether and how to investigate. The Designated Safeguarding Lead should be prepared to contribute to the strategy discussion.

8.7 Social Services are required to acknowledge written referrals within one working day, although schools should expect a prompter response in cases which appear to be urgent. If the School has not heard from Social Services after two working days the School should contact Social Services again. A record of each contact with Social Services, including the name of the officer with whom the School has spoken should be kept.

9. Duty to report concerns about the management of safeguarding

9.1 The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime, and feel confident that such concerns will be taken seriously by the senior leadership team. The duty to report concerns about the management of safeguarding is part of the Code of Conduct, which is included as an appendix to this document, and the Whistleblowing Policy, which is located within the Trust Employment Manual. It will also be reflected in staff training.

9.2 Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns.

9.3 The member of staff or volunteer should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Head.

9.4 However, where someone reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Chair of Governors (via the Bursary), refer their concerns to children's social care directly, or use the NSPCC whistleblowing helpline (see section 11 for contact details).

10. Monitoring and Review

10.1 The working of this Policy will be monitored locally by the Designated Safeguarding Lead in the School who will report as required to the Head.

10.2 A member of the Governing Council will undertake an annual audit visit and other periodic checks in order to monitor the School's implementation of these policies and procedures, together with a review of the safeguarding incidents that have arisen and how they were managed.

10.3 The annual review will be reported back to the Governing Council, which will monitor compliance. A member of the Council is nominated as Liaison Governor for Child Protection issues to oversee the management of safeguarding at organisational level, delegating where appropriate to members of the Senior Leadership Team. This governor is currently Miss Sue Ross, Chairman of the Education Committee. The Health and Safety Committee will also consider the processes in place for promoting the welfare of pupils.

10.4 The Governing Council acknowledges its overall responsibility in ensuring that this Policy is effective in its implementation and meets all current regulatory requirements. An annual

review of this Policy and associated procedures, and the efficiency with which associated duties have been discharged, will be undertaken so that any deficiencies or weaknesses can be remedied without delay. The Policy is also reviewed and updated by staff on an ongoing basis as required, and amendments reported to the Governing Council as appropriate.

10.5 The School's most recent safeguarding audit visit took place on January 11th 2016

11. Key Contacts

11.1 Sloane Square School Office: 0207 730 2971 Regent's Park School Office: 0207 723 0176
Bursary (to contact the Chair of Governors): 0207 730 8359

Designated Safeguarding Leads (DSLs)	
Sloane Square	**Regent's Park**
DSL: Jenny Bushell – Deputy Head Pastoral Ext: 227 Email: jenny.bushell@fhs-sw1.org.uk	DSL: Colette Mahieu – Pastoral Deputy Head Ext:216 Email: colette.mahieu@fhs-nw1.org.uk
Deputy DSLs: Paul Jeanes – Senior Deputy Head Ext: 201 Email: paul.jeanes@fhs-sw1.org.uk Suzy Dixon – Head of Junior School Ext: 246 Email: suzy.dixon@fhs-sw1.org.uk	Deputy DSL: Maria Merrigan – Head of PSHE Ext: 212 Email: maria.merrigan@fhs-nw1.org.uk
DSL trained: Julia Banks/Rachel Sawyer – Joint Heads of Sixth Form Ext 216 Email: headofsixthform@fhs-sw1.org.uk	TBC new appointment

11.3 Multi-agency contacts

To report a concern about a child: Westminster LCSB Access Team	0207 641 4000 (out of hours 0207 641 2388)
For LADO referrals **(allegations against staff)** Bi-Borough Safer Organisations Manager – Kembra Healy	07522 217314 kembra.healy@rbkc.gov.uk
Westminster LADO	0207 641 7668 LADO@westminster.gov.uk
Kensington and Chelsea LADO	020 7361 3013

NSPCC – reporting abuse	0808 800 5000 https://www.nspcc.org.uk/you-can-do/report-abuse/
CEOP	0870 000 3344 (or 999 in an emergency)
DfE dedicated telephone helpline/mailbox for non-emergency **advice for staff and governors**	020 7340 7264
NSPCC **Whistleblowing** helpline:	0800 028 0285 (8:00 AM to 8:00 PM, Monday to Friday) help@nspcc.org.uk
	KCLADO.Enquiries@rbkc.gov.uk
For **Prevent** enquiries – Prevent Programme Manager – Mark Chalmers	0207 641 6032
Government's **Prevent** Duty helpline	0207 340 7264
Local **Police** (non-emergency)	101 (in an emergency always dial 999)
Bypass (**alcohol and substance** service)	020 8460 9952
Young Minds	0808 802 5544

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If you have an enquiry which does not relate the Bi Borough area, you can access a full list of London borough safeguarding contact numbers here http://www.londonscb.gov.uk/london-safeguardingcontacts/

APPENDICES

Appendix 1: staff code of conduct

Introduction

The safety and well-being of every pupil at Francis Holland School is of paramount importance. Every child has the right to grow up and to live in a safe environment. All staff have a duty to protect pupils from abuse and bullying and to promote their well-being.

Every member of staff should read this code of conduct in conjunction with the school's Child Protection Policy and other associated policies. Staff are invited to review this code of conduct annually, and copies are sent to the Governors.

Promoting Awareness

Our curriculum and pastoral systems are designed to foster the spiritual, moral, social, and cultural development of all our pupils. All our teaching staff play a vital role in this process, helping to ensure that all of our pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and non-teaching staff to lead by example, and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety, and well-being. All the staff, including all non-teaching staff, have an important role in insisting that our pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our anti-bullying policy. Time is allocated in PSHE and form time to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others are never right. Assemblies, drama and RE lessons are also used to promote tolerance and mutual respect and understanding. We teach pupils about the unacceptability of

bullying and abusive behaviour and promote the safe use of the internet and mobile phones, inside and outside of school

Staff/Pupil Contact

- Staff should avoid unnecessary contact with pupils outside school;
- They should not give pupils their home address, home 'phone number, mobile 'phone number or personal e-mail address;
- They should not have pupils as 'friends' or be in direct contact with pupils on social networking sites. They should ensure that they themselves only use a secure setting on such systems;
- They should not make arrangements to meet pupils, individually, outside school other than on school trips authorised by the Head;
- They should avoid contacting pupils at home unless this is strictly necessary; they should keep a record of any such occasion;
- They should not give a pupil a lift in their own vehicle other than on school business and with permission from the Head;
- They should take a school mobile 'phone on any residential trip and use only this mobile for any necessary contact with pupils in connection with the trip. Mobile numbers of pupils should be deleted from the school mobile at the end of the trip.
- Pupils are deemed to leave the school on 31 December of the calendar year in which they leave. They are deemed not to be pupils after this time.

Members of staff who are friends with parents of pupils or who, for example, are voluntary workers in youth organisations attended by pupils, will of course have contact with those pupils outside school. However, they should still respect the above advice wherever possible and should keep the Head informed of such relationships.

It is inappropriate for a member of staff to have a sexual or intimate relationship with a pupil of any age and it may be a criminal offence under the Sexual Offences Act 2003 even if the pupil is aged 16 or 17. To have such a relationship even with a pupil over 18 also contravenes the Duty of Care and will result in referral to the relevant authorities.

Language

Staff should not swear, blaspheme, or use any sort of offensive language in front of pupils. Staff should not make sexual innuendos or any comments of a sexual nature (other than in the context of the curriculum, and should avoid displays of affection either personally or in writing (e.g. messages in birthday cards, text messages, emails etc.) Staff should avoid words or actions which are over familiar.

The classroom

Staff should not incorporate in lessons material that is inappropriate or use highly personal information about themselves or others.

Isolation

Wherever possible, staff should avoid being alone in a room with a pupil. Where, for reasons of timetabling, confidentiality or other circumstances, this is not practicable, staff should ensure that the door to the room has a glass panel or is left open.

Physical Contact a) Reasonable force

By law, teaching staff, and other staff who are authorised by the Head to have control or charge of pupils, may use such force or physical contact as is reasonable in the circumstances to prevent a pupil from doing, or continuing to do any of the following:

- Committing a criminal offence;
- Injuring themselves or others;
- Causing damage to property, including their own;
- Engaging in any behaviour prejudicial to good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom or elsewhere.

This applies when a teacher, or other authorised person, is on school premises and when he or she is in control or charge of the pupil elsewhere, for example on a field trip or other authorised out of school activity. It only applies where no other form of control is available and where it is necessary to intervene.

Before intervening physically a teacher should, wherever practicable, tell the pupil to stop and what will happen if she does not. The member of staff should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. Staff should always avoid touching or holding a pupil in a way that might be considered indecent. Nor should they act in a way that might reasonably be expected to cause injury. The member of staff involved should inform the Head or Deputy Head immediately following an incident, except the most minor or trivial, where force has been used. This is to help prevent any misunderstanding or misrepresentation of the incident, and it will be helpful in the event of a complaint. The member of staff should provide a written report as soon as possible afterwards.

Action taken in self-defence or in an emergency

The law allows anyone to defend themselves against an attack provided they do not use more force than is necessary. Similarly, where a pupil is at risk of immediate injury or on the point of inflicting injury on someone else, any member of staff (whether authorised or not) would be entitled to intervene.

Contact in other situations

The law does not cover some other occasions when physical contact may be proper or necessary. Some physical contact may, for example, be necessary to demonstrate exercises or techniques during music or PE lessons or sports coaching, or if a member of staff has to give first aid. In such circumstances the member of staff should first explain the intended action to the pupil. They should not proceed with the action if the pupil appears to be apprehensive or reluctant or if there are other concerns about the pupil's likely reaction. If at all possible staff should ensure that the door is open and, if in any doubt, should ask a colleague or another pupil to be present during the demonstration.

Touching may also be appropriate where a pupil is in distress and needs comforting. Staff should use their own professional judgment when they feel a pupil needs this kind of support.

Note: there is no legal definition of “reasonable force”. It will always depend on the circumstances. Note that:

- Physical force could not be justified to prevent a pupil from committing a trivial misdemeanour;
- Any force used should always be the minimum needed to achieve the desired result;
- Whether it is reasonable to use force and the degree of force that could be reasonably employed might also depend on the age, understanding, and sex of the pupil.

Corporal punishment

Corporal punishment: Under section 131 of the School Standards and Framework Act (1998), corporal punishment is prohibited for all pupils in independent and maintained schools and it is never used at Francis Holland School.

Whistleblowing (see also separate Whistleblowing Policy in the Employment Manual)

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to the Head. If there is evidence of criminal activity, the police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in the public interest needs to fear retribution. A member of staff who uses the whistle-blowing procedure is entitled to have his/her name protected from being disclosed by the Head to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that his/her evidence may be required by the police to be used in any criminal proceedings. There are further details of the whistleblowing procedure in the Employment Manual for staff.

Photographs

As stated in the Terms and Conditions, section 6 paragraph 15, parents who do not want their child's photograph or image to appear in any of the School's promotional material must make sure their child knows this and must write immediately to the Head requesting an acknowledgement of their letter. (See separate Information Systems Policy).

Electronic Communication

Please see the separate Information Systems Policy and Codes of Conduct for further details.

Confidentiality and data protection

Staff should respect the privacy of pupils, parents and colleagues and should not pass information about, for example, addresses or telephone numbers to others, without checking first with the person concerned.

Lists of pupils'/parents' names and addresses must not be used for any purpose without the consent of the Head.

Information about pupils, parents, or colleagues should never be disclosed to telephone enquirers. **Note:** Never give an undertaking of confidentiality to a pupil where child protection issues are involved.