

<b>Committee(s):</b>	<b>Date(s):</b>
Board of Governors of the City of London School for Girls Board of Governors of the City of London School	21 <sup>st</sup> June 2013 26 <sup>th</sup> June 2013
<b>Subject:</b> Child protection policy	<b>Public</b>
<b>Report of:</b> Town Clerk, Headmaster (CLS) and Headmistress (CLSG)	<b>For Decision</b>
<b>Summary</b>	
<p>It is a statutory obligation to annually review the child protection policy. The attached policy incorporates additional guidance from the Department for Education on safeguarding and staff recruitment. It highlights the collaboration between the City of London Corporation as proprietor and the school. The revised policy further outlines the proprietor's obligation to ensure that necessary and appropriate safeguarding training is provided to school governors.</p>	
<b>Recommendation(s)</b>	
Members are asked to approve the revised child protection policy.	



## CHILD PROTECTION POLICY

City of London School (CLS)  
City of London School for Girls (CLSG)

### **Statement:**

**We 'The School' are committed to safeguarding and promoting the welfare of children and young people and expect all Staff and Volunteers to share this commitment.**

### **1.0 Introduction**

- 1.1 This policy has been prepared in accordance with the requirements of:
  - 1.1.1 relevant legislation, including the Children Act 2004, the Education Act 2002, and the Education (Independent School Standards) (England) Regulations 2010;
  - 1.1.2 relevant guidance issued by HM Government, including "*What to do if You are Worried a Child is Being Abused*" 2003, "*Keeping Children Safe In Education*" March 2013, "*Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings*" March 2009, "*Working Together to Safeguard Children*" March 2010, "*Dealing with allegations of abuse against teachers and other staff: Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools*", October 2012, "*Use of reasonable force in schools*" September 2012; and "*Pan London Child Protection Procedures*" April 2011.
  - 1.1.3 other relevant standards and guidance, including guidance issued by the Independent Schools Inspectorate entitled – *Handbook for the Inspection of Schools, The Regulatory Requirements*, January 2013.
  - 1.1.4 relevant Local Safeguarding Children Board (LSCB) Procedures.
- 1.2 This policy has been prepared in consultation with the Community and Children's Services Department at the City of London, the proprietor and relevant local authority. (See Appendix for contact details which may be updated from time-to-time as necessary to reflect changes in personnel.)
- 1.3 The Governing Body, on behalf of the City of London as Proprietor of the School, takes seriously its responsibility under section 157 of the Education

Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children where there are concerns about a child's safety and welfare.

- 1.4 We recognise that all adults, including Staff and Governors, have a full and active part to play in protecting pupils from harm, and that the child's welfare is our paramount concern. Wherever the word "Staff" is used, it covers ALL staff on site, including temporary and support staff, contractors' employees working regularly on the School's premises, and volunteers working with children. Further information on contractor employees is given in paragraph 2.1.10.
- 1.5 The School, through its Governors and Staff, is committed to providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- 1.6 The aims of this policy are:
  - 1.6.1 To support each child's development in ways that will foster awareness, understanding, security, confidence, resilience and independence.
  - 1.6.2 To provide an environment in which all children and young people feel safe, secure, valued and respected, and also feel confident to approach adults if they are in difficulties believing they will be effectively listened to.
  - 1.6.3 To raise the awareness of all Staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases, or suspected cases, of abuse.
  - 1.6.4 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support packages for those children.
  - 1.6.5 To emphasise the need for good levels of communication between all members of Staff.
  - 1.6.6 To develop a structured procedure within the School, which will be followed by all members of the School community in cases of alleged or suspected neglect, abuse and/or any other child welfare concern.
  - 1.6.7 To develop and promote effective working relationships with other agencies, especially the Police and Community and Children's Services.
  - 1.6.8 To ensure that all adults within the School who have substantial access to children have had a criminal records check in accordance with the safeguarding requirements in this Policy and as required by law.
- 1.7 Should any deficiencies or weaknesses in child protection arrangements become apparent, the arrangements will be remedied without delay.

## 2.0 Procedures

- 2.1 Our school procedures for safeguarding children have been prepared in accordance with relevant legislation, guidance and Pan London Child Protection Procedures. We will ensure that:
- 2.1.1 Arrangements are in place at the School to deal with allegations of abuse, or suspected abuse, which will be referred to the Local Authority Designated Officer (LADO), and the School will engage with other statutory agencies, as necessary, to provide inter-agency support to the child concerned.
  - 2.1.2 All members of the Governing Body understand the need for and fulfil their responsibilities under this Policy, and are provided with a copy of this Policy upon their appointment to the Governing Body. There is one nominated Governor who is responsible for child protection and who has skills commensurate for this role. The City of London, as Proprietor, will undertake to ensure that relevant training is provided for Governors.
  - 2.1.3 The School has a designated senior member of staff, our Child Protection Liaison Officer (CPLO), who has undertaken relevant child protection training delivered through the local LSCB representative.
  - 2.1.4 There will be an additional member of school Staff who will act in place of the designated CPLO when absent, and must receive relevant child protection training.
  - 2.1.5 All members of School Staff are provided with relevant Child Protection Awareness information to develop their understanding of the signs and indicators of abuse, along with individual responsibilities to respond to any child welfare concerns in accordance with the School's child protection procedures. In particular all Staff understand the need to avoid asking leading questions of children when a child protection matter is brought to the Staff member's attention. The School must also refrain from undertaking an investigation without first consulting the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations.
  - 2.1.6 All members of Staff and Governors are advised on how to respond to 'Disclosures of Abuse' through relevant child protection awareness training. In particular training will ensure that they understand the need to: consider measures that may be necessary to protect individual pupils; avoid asking leading questions of pupils; avoid giving inappropriate guarantees of confidentiality; make and keep written records; and report the matter to the CPLO.
  - 2.1.7 Safer recruitment practices are always followed through rigorous recruitment process and procedures for Staff, striking a balance between the need to protect children from abuse and the need to protect Staff from false or unfounded allegations. Our selection and recruitment of Staff includes relevant criminal record checks for their suitability for work and the receipt of barred list checks for new staff. All Staff that regularly come into contact with pupils, including contracted support staff such as cleaners and caterers, will be

required to have a criminal records check on appointment and then every three years following. These checks will also be carried out on existing Staff with a break in service of more than three months or where Staff have, since their initial appointment to a position not requiring a Disclosure, moved to work that involves significantly greater responsibility for children. In accordance with procedures adopted by the City of London, criminal records checks will also be carried out on all new Governors at the School. Repeat checks for Staff and Governors will be undertaken in accordance with City of London procedures.

- 2.1.8 Where we have grounds for believing that a member of Staff may be unsuitable to work with children that this is notified to the appropriate bodies including the ISA. The School will, as soon as possible and within one month, report to the ISA anyone whose services are no longer used, whether because the School has removed them from work with children or the person has chosen to cease work, and there are grounds to believe they are unsuitable to work with children; and ensure that any allegation is followed up in accordance with statutory guidance.
- 2.1.9 All parents/carers are made aware of the responsibilities of Staff with regard to child protection procedures through publication of the School's Child Protection Policy on the School website, and reference to it in our introductory School pack. The Policy is also available upon request to the School.
- 2.1.10 Where a contractor's employees visit the School premises irregularly, and are therefore not subject to the same requirements as contractors' employees working regularly on site (as set out otherwise in this Policy), relevant written assurances are obtained from the contractor that all staff have had a criminal records check within the past three years. Information regarding these checks will be provided by the contractor to the School upon request. Contracts require on-going monitoring and audit of the eligibility of those employees to work with children and any subsequent concerns arising which would affect their continued eligibility must be disclosed immediately to the City of London. Any allegation of abuse will be dealt with in accordance with the Pan London Child Protection Procedures.
- 2.1.11 Written assurance is obtained that any staff employed by another organisation and working with the School's pupils on another site have had a criminal records check within the past three years.
- 2.1.12 Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time. Where school premises are used by outside bodies who are not working with children, there will be sufficient safeguards in place to protect the health, safety and welfare of pupils. Measures will also be in place to protect against the interruption of pupils' education by third party users of the School's premises.
- 2.1.13 All community users are made aware of the school's child protection policy and those working with children understand the school's child protection guidelines and procedures.

- 2.1.14 Where appropriate, senior pupils given positions of responsibility over other pupils will be briefed on appropriate action to take should they receive any allegations of abuse.
- 2.2 Our procedures will be reviewed annually by the Board of Governors. The review will also include a review of the efficiency with which the related duties have been discharged or deficiencies (if any) have been rectified.
- 2.3 The name of the CPLO will be clearly advertised in the School, with a statement explaining the School's role in referring and monitoring cases of suspected abuse and/or risk to a child.
- 2.4 All new members of Staff will be given a copy of our Child Protection policy, and the Department for Education procedures, "What to do if You're Worried a Child is Being Abused", with the CPLO's name clearly displayed, as part of their induction into the School.
- 2.5 A single central record is held detailing all staff employed by the school and the relevant safeguarding checks undertaken.

### **3.0 Responsibilities**

- 3.1 The CPLO is responsible for:
- 3.1.1 Referring a child to the LADO whenever a professional allegation or disclosure of abuse has been made or if there are concerns about possible abuse, and acting as a focal point for staff to discuss concerns. All referrals will be carried out in accordance with The Pan London Child Protection Procedures.
- 3.1.2 Keeping written records of concerns about a child even where no immediate referral is required.
- 3.1.3 Ensuring that all such records are kept confidentially and securely in accordance with the Data Protection Act 1998 and are kept separate from pupil records.
- 3.1.4 Ensuring that an indication of record-keeping is marked on the pupil records.
- 3.1.5 Liaising with other agencies and professionals and ensuring that contact with the relevant welfare agency will be made as soon as possible, but in any event within 24 hours, upon the disclosure or suspicion of abuse. The referral shall be made in writing or with written confirmation of a telephone referral.
- 3.1.6 Ensuring their attendance at case conferences, core groups, or other multi-agency planning meetings, and otherwise co-operates with the Local Authority and other agencies to support inter-agency working.
- 3.1.7 Ensuring that any pupil currently on the Child Protection Plan who is absent without explanation for two days is referred to the Child's Social Worker.

- 3.1.8 Undertaking training in child protection, including training in inter-agency working that is provided by, or to standards set by, the LSCB, and undertaking refresher training at two yearly intervals to keep his or her knowledge and skills up to date.
- 3.1.9 Organising child protection training for all school Staff (including induction training for all newly appointed Staff) and arranging refresher training for the Head teacher and all other Staff working with children at three yearly intervals.
- 3.1.10 Providing, with the Head and in consultation with the Town Clerk, an annual report for the Board of Governors, detailing - any changes to the policy and procedures; training undertaken by the CPLO, all Staff and Governors; the number and type of incidents/cases; and the number of children on the child protection register (anonymised).

#### **4.0 Supporting Children**

- 4.1 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.
- 4.2 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.
- 4.3 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.4 The School will support all pupils by:
  - 4.4.1 Encouraging self-esteem and self-assertiveness, through the curriculum as well as in our relationships, whilst attempting to counteract aggression and bullying.
  - 4.4.2 Promoting a caring, safe and positive environment within the School.
  - 4.4.3 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - 4.4.4 Notifying the child's Local Authority as soon as there is a cause for significant concern.
  - 4.4.5 Providing continued support to school leavers identified as potentially at risk of abuse, by ensuring that appropriate information is forwarded under confidential cover to the pupil's new school and ensuring relevant medical records are forwarded as a matter of priority.
- 4.5 Working with the Local Authority (or the Police as appropriate) where a child may have suffered significant harm, or there may be a criminal prosecution, to consider what support the child or children involved may need.

#### **5.0 Confidentiality**

- 5.1 We recognise that all matters relating to child protection are confidential subject to overriding legal obligations to disclose information to ensure the safety and well-being of a child. Every effort will be made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
- 5.2 The Head or CPLO will disclose any information about a pupil to other members of Staff on a need to know basis only consistent with legal requirements, and in accordance with the Pan London Child Protection Procedures. The Head or CPLO, LADO, Police, and Town Clerk (together with other relevant City Officers) will agree who needs to know about the matter, exactly what information can be shared, how to manage speculation etc, and how to manage any press interest.
- 5.3 All Staff are made aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 5.4 All Staff are made aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 5.5 We will always inform parents/carers of an allegation affecting their child as soon as possible (if they already do not know of it). However, where a Strategy Meeting is required, the CPLO or Head will consult with the LADO (and other relevant agencies such as the Police) beforehand to agree what information can be disclosed to parents so as not to put the child at greater risk of harm, or impede a criminal investigation. Parents/carers will normally be kept informed about the progress of the case and told the outcome where there is no criminal prosecution, including the outcome of any disciplinary process, in confidence.

## **6.0 Dealing with Allegations of Abuse Against Staff**

- 6.1 Procedures for dealing with allegations of abuse against Staff are carried out in accordance with HM Government Guidance: *The Education Act 2011; Dealing with allegations of abuse against teachers and other staff: Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools (October 2012)* 'Safeguarding Children and Safer Recruitment in Education' (March 2007) and 'Dealing with Allegations of Abuse Against Teachers and Other Staff' (August 2011) and the Pan London Child Protection Procedures 4<sup>th</sup> Edition. All Staff are made aware of this guidance, the School's procedures, and other local guidance relating to this issue.
- 6.2 All School Staff should take care to ensure that professional boundaries are maintained so that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (e.g. one-to-one tuition, engaging in inappropriate electronic communication with a pupil etc). It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 6.3 We understand that a pupil may make an allegation against any member of Staff.
- 6.4 If such an allegation is made, the member of Staff receiving the allegation will immediately inform the Head and the CPLO. The LADO and the Town Clerk



will be promptly informed of any allegation. The Head on all such occasions will also discuss the allegation with the Chairman of Governors where appropriate. In the absence of the Head the allegation should be passed direct to the Chairman of Governors.

- 6.5 If a professional allegation is made against the Head, the person receiving the allegation will immediately inform the Chairman of Governors who will consult as in 6.4 above, without notifying the Head first.
- 6.6 The purpose of the initial discussion (per 6.4 and 6.5 above) is to consider the nature, content and context of the allegation and to agree a course of action, including whether to obtain any additional relevant information. Where this initial sharing of information and evaluation leads to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, the decision and a justification for it will be recorded by both the Head or CPLO and the LADO and agreement reached as to what information should be put in writing to the individual concerned and by whom. The Head or CPLO and the LADO will then consider what action will follow in respect of the individual and those who made the initial allegation.
- 6.7 The publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation), will remain confidential. Any such information will only be released if the member of Staff is charged with an offence.
- 6.8 Any professional allegation will precipitate a strategy meeting, which will involve representatives from the school and the City of London, to decide on the most appropriate action. This is in accordance with the Pan London Child Protection Procedures.
- 6.9 Where a member of Staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the LADO or the Police. We will follow the City of London's Disciplinary Procedures when managing allegations against Staff, a copy of which is readily available in the School. Disciplinary action will be considered in conjunction with discussions at the Strategy Meeting.
- 6.10 We would not normally send a child home, pending such an investigation, unless this advice is given exceptionally as a result of a Strategy Meeting.
- 6.11 Suspension of the member of Staff, excluding the Head, against whom an allegation has been made, needs careful consideration and will not be the default approach adopted. The decision to suspend will be based on information received at the strategy meeting, the information on potential risks to children and whether it compromises any criminal investigation.
- 6.12 In the event of an allegation against the Head, the decision to suspend will be made by the Chairman of Governors with advice as in 6.10 above.
- 6.13 Any allegation of abuse made against a member of Staff will be dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

## **7.0 Dealing with Allegations of Abuse by one or more Pupil/s Against another Pupil**

- 7.1 Allegations of abuse by one or more pupil against another pupil are taken very seriously.
- 7.2 If such an allegation is made, the member of Staff receiving the allegation will immediately inform the Head and the CPLO. The Head on all such occasions will discuss the content of the allegation with the Town Clerk, any other relevant City Officer, and the Chairman of Governors where appropriate.
- 7.3 The Children's Social Care Team will also be promptly informed of any allegation.
- 7.4 An allegation of abuse will normally be referred to a Strategy Meeting, involving representatives from the School and the Local Authority. A Strategy Meeting also covers any urgent formal strategy discussion which may take place between the police, social care and education managers prior to the first meeting.
- 7.5 We would not normally send a child home, pending such an investigation, unless this advice is given exceptionally as a result of a Strategy Meeting.
- 7.6 Suspension of the pupil, against whom an allegation has been made, needs careful consideration, and the Head will seek the advice from the City of London Corporation and any other relevant City Officer before deciding on the course of action to be taken.
- 7.7 A bullying incident (as in 11.2 below) will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the matter will be reported to the CPLO and to the Children's Social Care Team

## **8.0 Supporting Staff**

- 8.1 We recognise that Staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such Staff by providing an opportunity to talk through their anxieties with the CPLO and to seek further support as appropriate.
- 8.2 Where a member of Staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. The Proprietor will appoint a named representative to keep the individual informed of the progress of the case and consider what other support is appropriate. The investigation will be managed promptly.

## **9.0 Whistleblowing**

- 9.1 We recognise that children cannot be expected to raise concerns in an environment where Staff fail to do so.

- 9.2 All Staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. Staff can also utilise the City's 'Whistleblowing' facilities via the telephone hotline and/or website.

## **10.0 Physical Intervention**

- 10.1 The School's policy on physical intervention by staff is set out in the Teachers Guide and has regard to HM Government's Guidance: '*Use of reasonable force*', September 2012. The policy acknowledges that Staff have a legal power to use reasonable force i.e. to use no more force than is needed in the circumstances to control or restrain pupils. Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. Physical intervention must be necessary and proportionate to the level of risk and will normally be used as a last resort.
- 10.2 Such an event should be recorded and signed by a witness should there be one. If there was no witness the CPLO must be informed immediately.
- 10.3 Staff should avoid touching or restraining a pupil which gives rise to an unacceptable risk of physical harm or in a way that could be interpreted as sexually inappropriate conduct. Physical intervention of a nature which causes injury or distress to a child may need to be considered under child protection or disciplinary procedures.
- 10.4 We understand that force may never be used as a punishment.
- 10.5 All complaints about the use of force should be thoroughly, speedily and appropriately investigated. The school will follow the procedures outlined in paragraph 7.0 should a complaint be received.

## **11.0 Equalities and Bullying**

- 11.1 The School adheres to the City of London's Equal Opportunities Policy and action will be taken to prevent, and respond to, incidents of inappropriate discrimination, harassment and victimisation, in particular because of differences which arise out of gender or gender reassignment, pregnancy or maternity, special educational need or disability, race, religion or belief, cultural or linguistic background, or sexual orientation. The School acknowledges that repeated incidents or a single serious incident may lead to consideration under child protection procedures.
- 11.2 Our policy on bullying (including racial, religious, cultural, sexual/sexist, homophobic, special educational needs or disability, and cyber bullying) is set out in a separate document (The Anti-Bullying Policy). The policy acknowledges that to allow or condone bullying may lead to consideration under child protection procedures, in particular where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the matter will be reported to the CPLO and to the LADO.

## **12.0 Prevention**

- 12.1 We recognise that the School plays a significant part in the prevention of harm to our pupils by providing pupils with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- 12.2 The School community will therefore:
  - 12.2.1 Establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
  - 12.2.2 Ensure that all children know there is an adult in the School whom they can approach if they are worried or in difficulty.
  - 12.2.3 Incorporate into the curriculum, including PSHE, information and opportunities which equip children with the awareness and skills they need to stay safe from harm and to know to whom they should turn for help.

### **13.0 Health & Safety and Related School Policies & Procedures**

- 13.1 Our Health & Safety policy, set out in a separate document, details the measures being taken by the School to promote the health and safety of all children and staff within the School's environs. Other aspects, such as the procedures for internet use and School trips are set out in this and/or other School policies.

### **14.0 Relevant Contacts**

- 14.1 Relevant contact details for issues relating to child protection at the School can be found in the attached Appendix.

**Revised June 2013**

**Approved by the Board of Governors**

**(and signed by the Chairman)**

## APPENDIX

### **City of London School**

Address: Queen Victoria Street,  
London, EC4V 3AL

Telephone: 020 7489 0291

Headmaster David Levin

CPLO Gary Griffin (Second Master)

LADO Pat Dixon (City of London)  
020 7332 1215  
[pat.dixon@cityoflondon.gov.uk](mailto:pat.dixon@cityoflondon.gov.uk)

### **City of London School for Girls**

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Headmistress Diana Vernon

CPLO Andrew Douglas (Deputy Head)

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