Board of Governors of the City of London School for Girls

Date: **MONDAY, 5 OCTOBER 2020**
Time: 8.30 am
Venue: **VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)**

SUPPLEMENTARY AGENDA – APPENDICES PACK

12. **POLICIES FOR APPROVAL**

    Report of the Headmistress of the City of London School for Girls.

    The policies for approval comprise:

    Appendix 1 - Safeguarding and Child Protection Policy
    Appendix 2 - Pupil Supervision Policy
    Appendix 3 - Predicted Grades Policy
    Appendix 4 - Fire Safety Policy and Procedures
    Appendix 5 - Health, Safety and Wellbeing Policy
    Appendix 6 - Special Educational Needs & Disabilities Policy
    Appendix 7 - English as an additional Language Policy
    Appendix 8 - ICT and eSafety Policy and Annexes
    Appendix 9 - Pupils' Use of ICT
    Appendix 10 - Missing Child Policy
    Appendix 11 - Anti-bullying Policy
    Appendix 12 - Admissions Policy

    For Decision
    (Pages 1 - 166)

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John Barradell
Town Clerk and Chief Executive

CITY OF LONDON SCHOOL FOR GIRLS

SAFEGUARDING AND CHILD PROTECTION POLICY

City of London School for Girls – safeguarding contact sheet	
School Contact Details	St. Giles' Terrace, Barbican, London, EC2Y 8BB 020 7847 5500
Headmistress	Jenny Brown 020 7847 5526 headpa@clsg.org.uk
Designated Safeguarding Lead (DSL)	Susannah Gilham (Deputy Head, Pastoral) 020 7847 5573 gilhams@clsg.org.uk
Deputy Designated Safeguarding Leads (DDSL)	Madeleine Garnham (Head of Senior School and Prevent Lead) 020 7847 5564 garnhamm@clsg.org.uk Justine Venditti (Senior Deputy Head, Lead Practitioner for Looked After Children) 020 7847 5513 vendittij@clsg.org.uk
Governor with Safeguarding Responsibility	Mary Ireland mary.ireland@cityoflondon.gov.uk
LADO	Pat Dixon (City of London) 020 7332 1215 pat.dixon@cityoflondon.gov.uk
Prevent Co-ordinator	David Mackintosh (City of London) 020 7332 3084 prevent@cityoflondon.gov.uk
Local Police number	101
City and Hackney Safeguarding Children Partnership	City of London: 020 7332 3621 Hackney: 020 8356 5500
City of London Children & Families Team (Social Care)	020 7332 3621/020 8356 2710 (out of hours emergencies) Dccsdutyf&ypteam@cityoflondon.gov.uk
DfE Counter-extremism hotline	020 7340 7264 counter-extremism@education.gsi.gov.uk

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1. 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 2014.

1.1.2 Relevant guidance issued by HM Government, including "Keeping Children Safe In Education" September 202019. All Staff are issued with the summary guidance of this document which includes Part 1 of the guidance notes.

Other official documents taken into consideration when formulating this policy include "Sexual violence and sexual harassment between children in schools and colleges", May 2018, "The Prevent duty Departmental advice for schools and childcare providers", 2015, "Prevent duty guidance for England and Wales, 2016, "The use of social media for on-line radicalisation" July 2015, "Working Together to Safeguard Children" July 2018, "What to do if You are Worried a Child is Being Abused" March 2015, "SEND Code of practice" September 2015, "Mental health and behaviour in schools", March 2015; "Information sharing: advice for practitioners", July 2018, "Use of reasonable force in schools" July 2013; Searching, Screening and Confiscation 2018, "Pan London Child Protection Procedures" 2015 (fifth edition), and "Channel Guidance" April 2015.

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, September 2019.

1.1.4 Relevant Local Safeguarding Partnership Procedures, the City of London Prevent Strategy and the City of London Prevent Information Sharing Agreement. The Designated Safeguarding Lead (DSL) and the two Deputy Designated Safeguarding Leads (DDSL) regularly attend meetings of the City and Hackney Safeguarding Children Partnership.

1.2 This policy has been prepared in consultation with the Community and Children's Services Department at the City of London. (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 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

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identify, assess, and support those children where there are concerns about a child's safety and welfare.

1.4 There are three broad categories of concern about pupils: children in need, children who are at risk of harm and children who have suffered, or are suspected of suffering, abuse. This policy covers all three categories.

1.5 We recognise that all adults, including Staff, Volunteers 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. Wherever the term "School Staff" is used, it covers ALL staff directly employed by the City of London Corporation. Further information on contractor employees is given in paragraph 2.1.17.

1.6 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.

1.7 The aims of this policy are:

1.7.1 To support each child's development in ways that will foster awareness, understanding, security, confidence, resilience and independence.

1.7.2 To ensure that decisions about appropriate actions are always taken with consideration for the best interests of the child.

1.7.3 To facilitate an understanding of the early help process and to help staff identify emerging problems so they can act on them by liaising with the DSL and by sharing information with other professionals.

1.7.4 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.

1.7.5 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 including radicalisation, child sexual exploitation and female genital mutilation. NB – although the usual procedure is for staff who have safeguarding concerns to alert the DSL or DDSL of them, it is the responsibility of all staff to report any suspicions they have, by-passing the DSL/DDSL if necessary and going straight to the LADO.

1.7.6 To promote a culture of 'it could happen here' and to support staff who act as whistleblowers in raising concerns about poor or unsafe practice and potential failures in the school safeguarding regime.

1.7.7 To provide a systematic means of monitoring children known or thought to be at risk of harm, including the risk of being drawn into terrorism and extremism, child sexual exploitation or female genital mutilation, and ensure we, the School, contribute to assessments of need and support packages for those children.

1.7.8 To emphasise the need for good levels of communication between all members of Staff.

1.7.9   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.

1.7.10   To develop and promote effective working relationships with other agencies, especially the Police, the City and Hackney Safeguarding Children Partnership, Community and Children Services, and the relevant Prevent Coordinators within Community Safety Partnerships.

1.7.11   To ensure that all adults within the School who have the opportunity to have contact with children have had Disclosure and Barring Service (DBS) checks in accordance with the safeguarding requirements in this Policy and as required by law. This includes relevant checks on adults involved in childcare activities at the School who could be subject to disqualification by association.

1.7.12   To ensure that all visiting speakers to the school have been appropriately vetted and are supervised in accordance with the Prevent duty to protect children from radicalisation by being drawn into terrorism and extremism.

1.8   This policy and its appendices are reviewed annually by Governors and are kept under constant review by the school. Should any deficiencies or weaknesses in child protection arrangements become apparent, the arrangements will be remedied without delay.

2.   Procedures

2.1   The school recognises that there is a difference between children who have suffered or are likely to suffer harm or are at risk of radicalisation who will require immediate action, and those whose needs fall below the threshold for immediate intervention but who nonetheless require additional support from one or more agencies. The former will be reported to City of London Children and Families Team (children's social care) immediately. The latter, who can be described as children in need, will be supported by inter-agency assessment using referrals under CAF (Common Assessment Framework) procedures when appropriate and working with other agencies as part of the Team Around the Child (TAC) and Channel panels. Our School procedures for safeguarding children have been prepared in accordance with relevant legislation, guidance and Pan London Child Protection Procedures. Contact details are set out at the beginning of the document. We will ensure that:

2.1.1   Arrangements are in place at the School to deal with cases and allegations of abuse, or suspected abuse, including radicalisation, child sexual exploitation and female genital mutilation, which will be referred to the Local Authority designated officer or team of officers (hereafter known as the LADO), who provide advice and will preside over any investigation of any allegation or suspicion of abuse directed at anyone working at the school. In the case of serious harm or if a crime may have been committed, police will be informed from the outset. The School will engage with the police, other statutory agencies and professionals, as necessary, to provide inter-agency support to the child concerned.

2.1.2   If a member of Staff discovers (either through disclosure by the victim or visual evidence) that female genital mutilation appears to have been carried out in a girl under 18, the teacher and the School will comply with their obligatory duty to report this information to the police.

2.1.3   The school assesses regularly and reviews the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist

ideology, based on an understanding, shared with strategic partners, of the risk on the local area. Appropriate referrals will be made in accordance with the School's local safeguarding partnership referral procedures. The School will consider whether it is appropriate to make a referral to the Channel Programme, in accordance with Channel Guidance, April 2015.

2.1.4   The school recognises that as well as needing to safeguard children who are at risk of harm, it needs to identify children who would benefit from early help and give support and advice to them, working with other agencies as necessary. The school is fully committed to making referrals under CAF (Common Assessment Framework) procedures when appropriate and to working with other agencies as part of the Team Around the Child (TAC) and Channel panels.

2.1.5   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 and a copy of "Keeping Children Safe in Education", September 202019 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 and their details are set out at the beginning of this document. The City of London will undertake to ensure that relevant training is provided for Governors.

2.1.6   The School has a designated senior member of staff from the school leadership team, our Designated Safeguarding Lead (DSL), who has undertaken relevant child protection training delivered through local safeguarding partnership representative and this training is updated at least every two years. Details of the DSL are set out at the beginning of this document.

2.1.7   There will be two additional members of School Staff (the Deputy Designated Safeguarding Leads or DDSL) who will act in place of the designated DSL when absent, and must receive relevant child protection training and this training is updated at least every two years. One of the DDSL is also the Prevent lead and has received suitable Prevent awareness training and the other is trained as the Lead for Looked After Children. Other members of the pastoral team will also receive appropriate child protection training. Details of the DDSLs are set out at the beginning of this document.

2.1.8   All Staff are provided with relevant Child Protection Awareness information and Child Protection training INSET in accordance with the local safeguarding partnership and at least once a year to provide them with the skills and knowledge to safeguard children effectively, developing their understanding of the signs and indicators of abuse, along with their individual responsibilities to respond to any child welfare concerns in accordance with the School's child protection procedures. As part of this, all Staff must read Part 1 of the "Keeping Children Safe in Education" September 202019 guidance documentation and confirm in writing that they have undertaken to do this. School leaders and those staff that work directly with children should also read Annex A. 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.

2.1.9   All Staff have the opportunity to contribute and shape safeguarding arrangements and child protection policy, building on their expertise in dealing with children on a daily basis.

2.1.10   All new members of Staff will have the roles of the DSL and DDSLs explained to them and will be given a copy of our Child Protection policy and its annexes (including Staff Code of Conduct), the Behaviour Management policy, the Children missing education policy, the IT and eSafety Policy, the City of London Corporation Whistleblowing procedures, and the Department for Education procedures, "What to do if You're Worried a Child is Being Abused 2015", as well as a copy of "Keeping Children Safe in Education September 202019", with the DSL and DDSL names clearly displayed, as part of their induction into the School. Speakers and volunteers are provided with an abridged version of the Safeguarding policy which includes the contact details of the DSL, the DDSLs and the LADO.

2.1.11   When children attend educational activities offsite, the school strives to ensure their safety by making sure that CLSG staff supervise them and that assurances are sought that staff of other organisations have been checked for suitability. Further details are in the Educational Visits Policy and its annexes.

2.1.12   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 DSL or the DDSL. The DSL will report matters to the LADO and to the Headmistress, unless it is a matter that involves the Headmistress herself, in which case the DSL will report the matter to the LADO and to the Chairman of Governors.

2.1.13   Everyone in the school, including pupils, are also made aware that, while the normal referral route is through the DSL, they have a duty to report concerns directly to the LADO if they feel that the school has made an inadequate response to their concerns.

2.1.14   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, provided by the Disclosure and Barring Service (DBS) for their suitability for work and the receipt of barred list checks for new staff, and checks of the Prohibited List. All Staff who have the opportunity to 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. Criminal record checks for Governors will be undertaken in accordance with regulatory requirements. There is a separate City of London Corporation policy on Recruitment which provides further details.

2.1.15   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 DBS. In some cases, a referral may be made to both the DBS and Teaching Regulation Agency (TRA). The School will, as soon as possible and, in any event, within one month, report to the DBS 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.

Where there have been concerns about a member of staff which have not reached the threshold for referral to the DBS, the school will consider a referral to the TRA, following the advice in 'Teacher Misconduct: the prohibition of teachers' October 2015. A referral will be made to the TRA where a teacher has been dismissed for misconduct, or would have been dismissed had he or she not resigned first.

2.1.16   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. Summaries of safeguarding procedures are posted in classrooms for the information of pupils.

2.1.17   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 Corporation. Any allegation of abuse will be dealt with in accordance with the Pan London Child Protection Procedures.

2.1.18   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.

2.1.19   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 and to have due regard to the Prevent duty to avoid school facilities being used as a platform for extremism. Measures will also be in place to protect against the interruption of pupils' education by third party users of the School's premises.

2.1.20   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.

2.1.21   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.

2.1.22 All visiting speakers are suitably vetted by a member of staff prior to their visit and are supervised by a member of staff during their time at school. Further details are set out in Annex 4.

2.1.23 The use of technology has become a significant component of many safeguarding issues. The DSL will work with the eSafety coordinator to reduce opportunities for harm and to promote effective education. Further detail is in the ICT and eSafety Policy and its annex.

2.1.24 Annex B to this document deals with the specific issues of Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage and Honour Based Violence. The School recognises and understands that these are all forms of abuse covered by this policy and would trigger the School's referral procedures.

2.1.25 Annex E covers child on child sexual violence and sexual harassment. These issues will always be taken seriously and are never acceptable as 'banter' or teasing.

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 names of the DSL and DDSLs are 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. The DSL and DDSLs have regular meetings to discuss effective safeguarding. If the DSL is absent, referrals should be made to a DDSL or the Headmistress.

2.4 For incidents which occur out of hours, an email should be sent to the DSL and the Headmistress who will take action as soon as possible. In emergencies, the police or social services should be contacted immediately.

2.5 The current contact details of all those involved in child protection are listed at the beginning of this document. Staff must sign to say they have read these documents. This applies to current staff as well when documentation is updated.

2.6 A single central record is held detailing all staff (and Volunteers) employed by the School and the relevant safeguarding checks undertaken, including those applicable to staff who may be disqualified by association.

3. Responsibilities

3.1 The DSL takes the lead responsibility for safeguarding and child protection including online safety. S/he 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 or radicalisation 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 Referring cases where a person is dismissed or has left due to risk or harm to a child to the DBS as required and referring cases where a crime may have been committed to the Police.

3.1.3 Liaising with the Headmistress to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

3.1.4 Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

3.1.5 Keeping written records of concerns about a child even where no immediate referral is required.

3.1.6 Ensuring that all such records are kept confidentially and securely in accordance with the Data Protection Act 2018 and are kept separate from pupil records.

3.1.7 Ensuring that an indication of record-keeping is marked on the pupil records.

3.1.8 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, including female genital mutilation, child sexual exploitation or radicalisation. The referral shall be made in writing or with written confirmation of a telephone referral.

3.1.9 Supporting Staff in liaising with other agencies and setting up an interagency assessment as appropriate in cases where early help is appropriate.

3.1.10 Where appropriate informing the police (when a crime has been committed) or the DBS and the TRA (when a person is dismissed or has left due to risk/harm to a child).

3.1.11 Informing the LA when a pupil is to be deleted from the school register for the reasons stipulated in the Education (Pupil Registration) (England) 2016. Further details are set out in paragraph 14.5.

3.1.12 Informing the LA of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more at such intervals as required by the LA as set out in Children missing education September 2016

3.1.13 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.

3.1.14 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.

3.1.15 Undertaking training in child protection in accordance with Keeping Children Safe in Education September 2019, including training in inter-agency working that is provided by, or to standards set by, the local safeguarding partners, and undertaking refresher training at least every 2 years with annual updates to keep his or her knowledge and skills up to date, including prevent awareness training.

3.1.16 Ensuring that the DDSLs are trained to the same standard as the DSL.

3.1.17 Organising child protection training for all School Staff (including induction training for all newly appointed Staff), in accordance with Keeping Children

Safe in Education September 202019, and arranging refresher training for the Headmistress and all other Staff with pastoral responsibilities <u>every two years</u>. All Staff receive an annual refresher INSET on child protection and safeguarding.

3.1.18 Providing, with the Headmistress and in consultation with the Town Clerk, an <u>annual</u> report for the Board of Governors, detailing - any changes to the policy and procedures; training undertaken by the DSL and deputy DSL, all Staff and Governors; the number and type of incidents/cases; and the number of children on the child protection register (anonymised).

3.1.19 Being alert to the specific needs of children in need, those with special educational needs and young carers.

3.1.20 Ensuring that, where children leave the School, their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt. The DSL will also consider whether to contact the new school before the child leaves in order to allow for the new school to have support in place when the child arrives.

3.1.21 The DSL's job description complies with Annex B of the guidance on Keeping Children Safe in Education September 2019.

4. 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 recognise that it is important for children to receive the right help at the right time to address risks and prevent issues escalating. We understand the importance of acting on and referring the early signs of abuse and neglect, listening to the child, the need for clear records and of reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

4.4 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.

4.5 We recognise that the following groups of children can face additional safeguarding challenges and of the need to be especially vigilant in recognising the signs of abuse and neglect in this group of children.

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;

- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited
- is a privately fostered child

4.6   The School will support all pupils by:

4.6.1   Encouraging self-esteem and self-assertiveness, through the curriculum as well as in our relationships, whilst attempting to counteract aggression and bullying.

4.6.2   Having clear policies and procedures to deal with peer on peer abuse (including sexting or banter) which make clear that abuse is abuse and will not be tolerated. For further detail see section 7 and Annex E and refer to the Anti-bullying policy and the IT and E-safety policies.

4.6.3   Promoting a caring, safe and positive environment within the School.

4.6.4   Aiming at all times to have a child-centred approach which considers the best interests of the child

4.6.5   Liaising and working together with all other support services and those agencies involved in the safeguarding and social care of children. The first point of contact in such cases will be the City of London Corporation LADO (pat.dixon@cityoflondon.gov.uk/02073321215).

4.6.6   Notifying the child's Local Authority as soon as there is a cause for significant concern.

4.6.7   Where appropriate, checking any concerns which do not appear to meet the threshold or are borderline on an anonymous basis with the child's Local Authority and following their guidance and recommendations.

4.6.8   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.

4.6.9   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.   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 Headmistress or DSL 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 Headmistress or DSL, 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 DSL or Headmistress 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.   Dealing with Allegations of Abuse Against Staff

6.1   Procedures for dealing with allegations of abuse against Staff, including supply staff, are carried out in accordance with HM Government Guidance: Keeping Children Safe in Education Part 4 (September 202019), and the Pan London Child Protection Procedures 5th Edition. All Staff are made aware of this guidance, the School's procedures, and other local guidance relating to this issue. All relevant contact details are set out on the front page of this policy.

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.

Staff are made aware that special care must be taken in any circumstances where an adult works on a one to one basis with a child and in any situation in which it may be necessary for an adult to make physical contact with a child, such as in music instrumental lessons or in sports coaching. See the advice to staff contained in appendices to this document.

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 Headmistress or, if she is not available, the DSL. The LADO and the Town Clerk will be informed within 24 hours of any allegation. The professional advice of the LADO will be of particular importance in these circumstances. The Headmistress on all such occasions will also discuss the allegation with the Chairman of Governors where appropriate. In the absence of the Headmistress the allegation should be passed direct to the Chairman of Governors. The School will not undertake its own investigation before receiving advice from the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations.

6.5   Any allegation against the DSL will be made directly to the Headmistress.

6.6   If a professional allegation is made against the Headmistress, the person receiving the allegation will immediately inform the Chairman of Governors who will consult as in 6.4 above, without notifying the Headmistress first.

6.7 The purpose of the initial discussion (per 6.4 and 6.6 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. The DSL should press for reconsideration as necessary. 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 Headmistress or DSL and the LADO and agreement reached as to what information should be put in writing to the individual concerned and by whom. The Headmistress or DSL and the LADO will then consider what action will follow in respect of the individual and those who made the initial allegation.

6.8 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 or if the DfE or TRA publish the information.

6.9 Any professional allegation will precipitate a strategy meeting, which will involve representatives from the School and other relevant agencies, to decide on the most appropriate action. This is in accordance with the Pan London Child Protection Procedures.

6.10 Subject to the approval of the LADO or the Police, 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. 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.

6.11 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.

6.12 Suspension of the member of Staff 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.

6.13 In the event of an allegation against the Headmistress, the decision to suspend will be made by the Chairman of Governors with advice as in 6.10 and 6.12 above.

6.14 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.

6.15 After every occasion on which a problem arises regarding safeguarding and a member of staff the school will review its procedures in the light of lessons learnt from the case and will amend them as necessary.

6.16 Where a child is found to have made a malicious allegation against a member of staff, they will be dealt with in accordance with the school's disciplinary procedures.

7. Dealing with Allegations of Abuse by one or more Pupil/s Against another Pupil (Peer on Peer Abuse) (see also Annex E on Sexual violence and harassment)

7.1   Allegations of abuse of whatever kind, including unpleasant initiation rituals, or attempts to radicalise by one or more pupil against another pupil are taken very seriously. Peer on peer abuse can take many forms, including:

physical abuse such as biting, hitting, kicking or hair pulling

sexually harmful behaviour/sexual abuse such as inappropriate sexual language, touching, sexual assault or rape

sexting including pressuring another person to send a sexual imagery or video content

teenage relationship abuse - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner

initiation/hazing - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them

prejudiced behaviour - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

7.2   If such an allegation is made, the member of Staff receiving the allegation will <u>immediately</u> inform the Headmistress and the DSL. The Headmistress 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 LADO and the City of London Children and Families Team (children's social care) will also be <u>promptly</u> 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 Headmistress will seek the advice from relevant agencies 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 DSL and to the City of London Children and Families Team (children's social care).

7.8   If there is a disclosure about pupil on pupil abuse, all children involved, whether perpetrator or victim will be treated as being 'at risk'.

7.9   There is further information about peer on peer sexual violence and abuse in Annex E

8.   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 DSL 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 School 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.   Whistleblowing

9.1   We recognise that children cannot be expected to raise concerns in an environment where Staff fail to do so. The School strives therefore to have a culture of safety, raising concerns, valuing staff and reflective practice.

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. Whistleblowing procedures are covered as part of new staff induction training and child protection regular training for existing staff.

9.3   Staff who raise concerns about safeguarding either with the school's senior management, or with the LADO will not suffer any negative consequences such as notes on their file or denial of promotion.

9.4   Where a member of staff is unhappy about the action taken by the school in relation to a particular concern raised by the staff member, the Headmistress will facilitate a mediation meeting with the staff member and the DSL to explain the school's actions and the reasons for them as far as is possible to maintain a child's confidentiality. If this meeting does not satisfy the member of staff, they should feel able to contact the LADO for more effective action.

9.5   If a staff member feels unable to raise an issue with the DSL or LADO and feels that their genuine concerns are not being met, they should use the NSPCC whistleblowing helpline; phone: 0800 028 0285, email: help@nspcc.org.uk.

10.   Physical Intervention

10.1   The School's policy on physical intervention by staff is set out in the Teachers Guide and in the school's policy on Physical Intervention and Restraint Policy and has regard to HM Government's Guidance: 'Use of reasonable force', July 2013. 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 DSL 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 <u>never</u> 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.   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 DSL and to the LADO.

12.   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, the Assembly programme including PSHC<u>E</u>E (Personal, Social, Health, Citizenship <u>and Economic</u> Education), 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.

12.2.4   Be proactive about safeguarding by making relationships and sex education and health education an integral part of the school's PSHCE<u>E</u> curriculum.

12.2.5   Make e-safety an integral part of safeguarding by explicitly teaching pupils how to keep safe online in Computer Science lessons working with City of London police, external speakers and through PSHCE<u>E</u>.

12.2.6   Ensure that children are resilient to radicalisation and are prepared to challenge extremist ideology by providing a safe environment for the discussion of sensitive issues, helping children to understand how they can participate in decision-making, and by promoting the spiritual, social, moral and cultural development of all pupils and within this, fundamental British Values. Further details are set out in Annex D.

12.2.7   Ensure that no political indoctrination takes place in any of the school curricular or extracurricular activities and that pupils are always exposed to a balanced presentation of political issues.

12.2.8   Ensure that all visiting speakers are suitably vetted and supervised to avoid political indoctrination. Details of the procedure to follow are in Annexe D to this policy.

12.2.9   Ensure that appropriate filtering is in place to prevent children being exposed to inappropriate, illegal or exploitative material, without such measures resulting in over-blocking that would lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

13. Private Fostering

13.1   A child who is under the age of 16 (or 18 if they have a disability) living with someone who is not a close relative for more than 28 days is classed as private fostering arrangement.

13.2   Children being privately fostered are required by law to be seen by a social worker, and if the School is aware of a private fostering arrangement then we must notify the Children and Families team at the Guildhall.

13.3   If the School is aware of someone who is looking after a child - or they plan to be – the Children and Families team must be informed so that they can check that the placement is suitable for the child. You should advise the person that they should contact the Children and Families team before the arrangement begins or within 48 hours of the arrangement being made in an emergency.

13.4   As a School we have a legal responsibility to inform the Children and Families Team of any private fostering arrangements that we become aware of.

13.5   More information about private fostering and keeping children safe can be found on the City and Hackney Safeguarding Children Partnership website: www.chscb.org.uk.

14. Children Who Go Missing From Education

14.1   CLSG monitors pupils' attendance through a daily register and any unexplained absences are investigated. A child going missing from education is a potential indicator of abuse or neglect.

14.2   Unauthorised absences must be reported to the Head of Year and Deputy Head Pastoral immediately and followed up with the parents or guardians.

14.3   Staff should be alert to the possible triggers of absence (particularly repeated absence) that may be indicative of wider safeguarding concerns. They should watch out for other potential signs of such safeguarding concerns as described in this policy and its annexes and report their concerns immediately to the DSL in accordance with the policy.

14.4   In accordance with paragraph 3.1.12 of this policy the DSL will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

14.5   In accordance with paragraph 3.1.11, the DSL will inform their local authority of any pupil who is going to be deleted from the admission register under any of the fifteen grounds set out in the Education (Pupil registration) (England) Regulations as amended.

This will be done as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register.

15.   Health & Safety, IT and Related School Policies & Procedures

15.1   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. For the avoidance of doubt, the School has adequate filtering systems to keep children safe when accessing the internet at school.

ANNEX A

TYPES OF ABUSE AND POSSIBLE SIGNS OF ABUSE

The following information about types of abuse is taken from "Keeping Children Safe in Education" (DFE September 202019).

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 each other.

Abuse

"A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those who know them or more rarely by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children."

Physical Abuse

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

Possible signs of physical abuse are:

Physical Indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends or vacations.
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stockings" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area.
- Rope burns
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression).
- Inappropriate or excessive fear of parent or caretaker.
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home.
- Unbelievable or inconsistent explanation for injuries.
- Lies unusually still while surveying surroundings (for infants).
- Unusual shyness, wariness of physical contact.

Sexual Abuse

"Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is

happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see Annex E)"

Possible signs of sexual abuse are:

Physical Indicators:

- Torn, stained or bloody underclothes
- Frequent, unexplained sore throats, yeast or urinary infections.
- Somatic complaints, including pain and irritation of the genitals.
- Sexually transmitted diseases
- Bruises or bleeding from external genitalia, vaginal or anal region.
- Pregnancy.

Behavioural Indicators:

- The victim's disclosure of sexual abuse.
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark).
- Promiscuity or seductive behaviours.
- Disturbed sleep patterns (recurrent nightmares).
- Unusual and age-inappropriate interest in sexual matters.
- Avoidance of undressing or wearing extra layers of clothes.
- Sudden decline in school performance, truancy.
- Difficulty in walking or sitting.

Emotional/Psychological Abuse

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

All abuse involves some emotional ill treatment: this category should be used where it is the main or sole form of abuse.

Possible signs of abuse are:

Physical Indicators:

- Eating disorders, including obesity or anorexia.

- Speech disorders (stuttering, stammering).
- Developmental delays in the acquisition of speech or motor skills.
- Weight or height substantially below norm.
- Flat or bald spots on head (infants)
- Nervous disorders (rashes, hives, facial tics, stomach aches).

Behavioural Indicators:

- Habit disorders (biting, rocking, head banging).
- Cruel behaviour, seeming to get pleasure from hurting children, adults, or animals; seeming to get pleasure from being mistreated.
- Age-inappropriate behaviours (bedwetting, wetting, soiling).
- Behaviour extremes, such as overly compliant-demanding; withdrawn-aggressive; listless-excitable.

Neglect

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

Possible signs of abuse are:

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour:
- Squinting.
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions.
- Untreated injury or illness.
- Lack of immunisations.
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds).
- Height and weight significantly below age level.

Behavioural Indicators:

- Unusual school attendance
- Chronic absenteeism.
- Chronic hunger, tiredness, or lethargy.
- Begging for or collecting leftovers.
- Assuming adult responsibilities.
- Reporting no caretaker at home.

Other Forms of Abuse or Warning Signs

Because of the cultural and social mix at CLSG, it is important for us to be aware of the growing number of cases in the UK of female genital mutilation, forced marriage and honour-based crimes which have occurred against children and the fact that such forms of abuse could be a safeguarding/child protection issue for some pupils in the School population. See separate annexes on Self-Harming, FGM, Child Sexual Exploitation and Forced Marriage/Honour Based Crimes.

All staff should be aware that behaviours linked to drug taking, alcohol abuse, truanting and sexting (youth produced sexual imagery) put children in danger. They should also be aware that safeguarding issues may manifest themselves via peer on peer abuse. This is likely to include, but is not limited to: bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, sexting and initiation rituals. Staff should refer to the Anti-Bullying policy and Annex E for details on how to deal with peer to peer abuse.

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues and should flag any concerns.

Exposure to domestic abuse can have serious, long lasting emotional and psychological impact on children. As with other forms of abuse, staff should be alert to the possibility and report any concerns they have promptly.

ANNEX B

AWARENESS OF FEMALE GENITAL MUTILATION (FGM), CHILD SEXUAL EXPLOITATION (CSE), FORCED MARRIAGE (FM) AND HONOUR BASED ~~VIOLENCE~~ ABUSE (HBV)

FEMALE GENITAL MUTILATION (FGM)

The following general statement about schools' responsibilities in relation to FGM is taken from "Keeping Children Safe in Education" (DFE July 2019).

Female Genital Mutilation (FGM): practitioners in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Practitioners should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and City of London Children and Families Team (children's social care)."

Warning Signs relating to FGM

The multi-agency practice guidelines identify a number of warning signs that a student may be at risk of undergoing FGM or may have already undergone it. These include:

- Practitioners overhearing students talking about FGM
- Disclosure by a student or one of her friends
- A child going abroad to a country where FGM is known to be prevalent for an extended period
- A child who presents with medical difficulties such as frequent urinary infections or severe menstrual problems
- Prolonged unexplained absence from school
- Behavioural changes such as withdrawal or depression
- Reluctance to agree to routine medical examination

Implications for CLSG

- All adults who work with girls and young women must be alert to the risk of FGM.
- A number of students at CLSG belong to communities in which FGM has traditionally been practised and have close family links with countries abroad where it is prevalent and so are potentially at risk.
- Teachers have an obligatory duty to report to the police when they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out in a girl under 18. Those failing to report such cases face disciplinary action. Teachers should still consider and discuss such cases with the DSL and involve City of London Children and Families Team (children's social care) as appropriate.

In addition to being vigilant and aware of the possibility of FGM affecting our students, the school will take proactive measures to raise students' awareness of the issue and to foster an atmosphere in which students will be able to voice concerns, by including FGM in ~~PHSCE~~ PSHCEE and elsewhere in the curriculum where appropriate.

CHILD SEXUAL EXPLOITATION

All children, whatever their backgrounds, can be at risk of CSE so Staff at CLSG need to be aware of its possibility.

Comprehensive information about CSE can be found on the NSPCC Website at

http://www.nspcc.org.uk/Inform/resourcesforprofessionals/sexualabuse/cse-homepage_wda97456.html

What is child sexual exploitation?

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to children in gangs.

POSSIBLE SIGNS OF CSE

- inappropriate sexual or sexualised behaviour
- repeat sexually transmitted infections; in girls repeat pregnancy, abortions, miscarriage
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- going to hotels or other unusual locations to meet friends
- getting in/out of different cars driven by unknown adults
- going missing from home or care
- having older boyfriends or girlfriends
- associating with other children involved in sexual exploitation
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- drug or alcohol misuse
- getting involved in crime
- injuries from physical assault, physical restraint, sexual assault

This is not an exhaustive list and indicators can change over time.

FORCED MARRIAGE (FM)

Some students at CLSG may be at risk of forced marriage or be related to people who are at risk of forced marriage, so it is important for Staff to be aware of its existence.

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

Warning signs of forced marriage to look out for:

- Depression and self-harming behaviour such as anorexia, cutting, substance misuse or attempted suicide.
- They may ask school nurses for vaccinations for an upcoming "family holiday" or about contraception.
- Victims who have already been forced into marriage may have injuries consistent with rape or domestic violence and may ask about termination of a pregnancy.

All school staff should be aware that children at risk are often strictly monitored by their parents. They may not be able to attend after-school activities or be allowed to talk to the opposite sex. They may be monitored by siblings while at school. They may not be allowed to consider going to university or getting a job after leaving school or college.

They may be about to travel on a planned "family holiday" or moving overseas which may be a cover story for a forced marriage. If these factors are present, the young person may be at risk of forced marriage and you should contact the DSL immediately

For information about forced marriage and relevant legislation see:

https://www.gov.uk/forced-marriage

HONOUR BASED ~~VIOLENCE~~ ABUSE (HBV)

For a summary of Honour Based Violence and relevant legislation go to the Crown Prosecution Website at

http://www.cps.gov.uk/legal/h_to_k/honour_based_violence_and_forced_marriage/#a04

There is no specific offence of "honour-based crime". It is an umbrella term to encompass various offences covered by existing legislation. Honour based ~~violence~~ abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such ~~violence~~ abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

It is a violation of human rights and may be a form of domestic and/or sexual violence. There is no, and cannot be, honour or justification for abusing the human rights of others.

The Crown Prosecution Service, the Association of Chief Police Officers and support groups have a common definition of HBV:

"'Honour based violence' is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community."
Some students at CLSG could be at risk of Honour Based Abuse~~HBV,~~

ANNEX C
SAFEGUARDING CODE OF CONDUCT

INTRODUCTION

All Staff accept responsibility for the welfare of children with whom they come into contact in the course of their work, and will report any concerns about a child or somebody else's behaviour, using the procedures laid down in the school's Child Protection Policy. Staff must have due regard to the Prevent duty both as part of their safeguarding responsibilities and as part of their professional conduct as stipulated by the Teachers' Standards part 2.

Susannah Gilham, ~~Rosie Lockyear~~Madeleine Garnham and Justine Venditti are the Designated Safeguarding Leads in the school who will take action following any expression of concern in accordance with the process laid out in the school's safeguarding and child protection policies.

The Headmistress and the school's Designated Safeguarding Leads know how to make appropriate referrals to statutory child protection agencies. Pat Dixon (020 7332 1512) is the City of London's Children and Families Service Manager (LADO) and should be consulted for all safeguarding matters via the DSL if the matter pertains to a City of London resident child, or an issue relating to potential / actual allegations against staff, and for advice on liaising with another LA in respect of safeguarding issues. The school will consult with the School's HR Business Partner within the COL HR Department also for HR advice and technical support concerning the process in relation to allegations made against staff.

All staff who come into contact with children in the course of their professional activities must adhere to the school's Child Protection Policy, the procedure for reporting safeguarding concerns and have regard to any other relevant guidance issued by the school. Failure to comply with these obligations may result in disciplinary action in accordance with the school's Disciplinary Procedure. Staff are also expected to observe the Teachers' Standards issued by the DfE at all times.

Information relating to any allegation or disclosure must be clearly recorded as soon as possible, as outlined in the Child Protection Policy and supporting documents.

The Children Act 1989 states that the 'welfare of the child is paramount'. This means that considerations of confidentiality which might apply to other situations should not be allowed to over-ride the right of children to be protected from harm. However, every effort should be made to ensure that confidentiality is maintained for all concerned when an allegation has been made and is being investigated.

The Child Protection Policy will be referred to or included in recruitment, training and policy materials, where appropriate, and the policy will be openly and widely made available to members and staff and volunteers and actively promoted within the organisation.

A culture of mutual respect between children and staff will be encouraged, with adults modelling good practice and professional behaviour at all times in line with the Teachers' Standards.

It is part of the school's acceptance of its responsibility of duty of care towards children that members of staff who encounter child protection concerns in the context of their work will be supported when they report their concerns in good faith. Staff must also be aware of the procedures for whistleblowing as detailed in the Child Protection policy and the City of London Corporation whistleblowing procedures.

- Inappropriate physical contact with children: Physical contact is only appropriate in very limited circumstances. For more detailed advice please see the school's policy on Physical Contact and Restraint. A copy will be supplied to all staff as part of their induction training along with the Child Protection Policy, and its annexes (including Staff safeguarding Code of Conduct) and the Department for Education guidance, "What to do if You're Worried a Child is Being Abused" March 2015 as well as a copy of "Keeping Children Safe in Education September 2019",
- Taking the lead from children in their behaviour or engaging in any behaviour that may be seen as in breach of the Teachers' Standards, be perceived as unprofessional, may bring the school into disrepute or may be misrepresented.
- Using confidential or sensitive information about a child or their family for their own benefit or to humiliate or embarrass a child. Confidential information about pupils or the School should not be shared casually however; information that might suggest that a child is in need or at risk of significant harm must be shared with the DSL, in accordance with the safeguarding / child protection procedures.
- Taking photos of children: Photographs and films taken for official school use may be covered by the Data Protection Act, e.g. if the images are going to be stored with other personal data. If the photograph is taken of groups of pupils during lessons and will be used in the school prospectus then the Data Protection Act does not apply. Names of children must not be published with photographs or films.
- Establishing or seeking to establish any social contact with a pupil or their parents/carers. Unplanned or other social contact that happens outside of the school setting should be reported to the Headmistress. Staff should not give their personal telephone numbers or email addresses to pupils or their parents. No member of staff will enter into extra or private tuition or childcare arrangements with parents without the permission of the Headmistress. Staff should notify their line manager of any existing or previous family or social relationship with a pupil or their parents/carers.
- Making suggestive or inappropriate remarks to or about a child, even in fun, as this could be misinterpreted. Inappropriate remarks include innuendo, swearing, and discussing their or your own intimate relationships.
- Other than for routine classwork related matters, communicating directly with children by email or text messages and only then with the prior consent of the child's parent or guardian. If electronic communication is necessary, best practice would be to communicate directly with parents or guardians and to copy in a senior colleague. Further guidance on electronic communications with pupils is to be found in Annex C of the Child Protection Policy.
- Communicating with children via Twitter, Facebook or other social media.
- Engaging in behaviour which could be construed as 'grooming' a child (for example giving a child money, presents or favours or talking or behaving in an inappropriate or unprofessional manner towards children).
- Communicating to the public, press, television or any outside agency the contents of any documents relating to the school/Corporation or the proceedings of any safeguarding matters that is confidential information unless required by law or authorised by an appropriate official to do so.
- Making personal use of telephones e-mail and internet facilities during work time. They may only use them at the Headmistress's discretion, or when there is an urgent need to contact someone in an emergency. The time spent should be kept to a minimum. Staff should also inform their family and friends only to contact them at work when it is necessary.
- It is not unusual for pupils or, sometimes, their parents to develop infatuations or "crushes" on staff. Staff must not keep this a secret. All such situations must be responded to sensitively to maintain the dignity of those concerned and any indications that this might be happening reported to the Headmistress. In addition the object of the pupil or

parent's affections may not even be aware of this. In this case colleagues must bring this to the colleague's attention and report to the Headmistress.

- It is not permissible to take children alone in a car on journeys, however short, unless with the prior consent of the child's parent or guardian, and then only in exceptional circumstances with prior authorisation from the Headmistress.

STAFF AND VOLUNTEERS MUST:

- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Dress appropriately whilst at work so that confidence of pupils, parents and the general public is maintained. Whilst the school values diversity and are not seeking to achieve a complete uniformity of dress style, the school does expect all employees' clothing at work to be neat, clean, modest and appropriate.
- Take a disclosure of abuse from a child seriously. It is important not to deter children from making a disclosure of abuse through fear of not being believed, and to listen to what they have to say. Guidance on responding to an allegation of abuse is set out in section 4 of the Child Protection Policy. If the allegation gives rise to a child protection concern it is important to follow the school's procedure for reporting such concerns, and not to attempt to investigate the concern yourself.
- Always report any concerns, however small, immediately to the school's Designated Safeguarding Lead in a non-judgemental manner regarding the conduct of another staff member in relation to children.
- Remember that those who abuse children can be of any age (even other children), gender, ethnic background or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.
- Value and respect children as individuals, and adult model appropriate conduct - which will always exclude bullying, shouting, racism, sectarianism or sexism.
- Obtain written permission from pupils and their parents/carers before taking photographs or films. All images and films must be stored appropriately and securely only used by those authorised to do so Staff should be able to give account of the rationale behind any images of pupils that are in their possession.
- Always follow the advice and guidance on child protection and safeguarding issues available via the relevant annexes of the school's Child Protection Policy which can be found in the staff handbook and on the school's website.
- Report any child who falls sick on a school trip to the DSL on return to school

GUIDANCE ON RESPONDING TO A CHILD MAKING AN ALLEGATION OF ABUSE:

- Stay calm.
- Listen carefully to what is said and show that you are taking it seriously.
- Find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Tell the child that the matter will only be disclosed to those who need to know about it.
- Allow the child to continue at her/his own pace.
- Ask questions for clarification only, and at all times avoid asking questions that suggest a particular answer.
- Reassure the child that they have done the right thing in telling you.
- Tell them what you will do next, and with whom the information will be shared (in school it will need to be a Designated Safeguarding Lead).
- Make no judgement about what you have heard.
- Record in writing what was said, using the child's own words as closely as possible, and as soon as possible - note the date, time, any names mentioned, to whom the information was given and ensure that the record is signed and dated.

- Remember that whilst you may have been the first person encountering an allegation of abuse it is not your responsibility to decide whether abuse has occurred. That is a task for the professional child protection agencies, following a referral from the Designated Safeguarding Lead from the school.

GUIDANCE ON AVOIDING BEHAVIOUR WHICH COULD BE MISINTERPRETED

All adults who work with children are at risk from false accusations of abuse or inappropriate behaviour. This is particularly true in the current climate of increasing parental empowerment and litigiousness and when reporting of abuse in the media is frequent. All Staff are advised to exercise common-sense and caution to ensure as far as possible that their behaviour is never open to misinterpretation. This is especially true of male staff working in a girls' school, but it is also applicable to female staff.

Much of the advice included in the CP policy is simply sound common sense and is routinely followed by all teachers. It is related to the maintenance of the appropriate boundaries, which are intrinsic to our profession. The culture of this school is intended to be supportive of the students and traditionally relations between Staff and pupils here are friendly. Nobody would wish for these positive aspects of school life to be replaced by excessive formality, or for there to be a climate of suspicion and distrust, but it is essential that a proper distance is maintained between teachers and students.

The following points should be borne in mind:

- Avoid being alone with a pupil unless it is really necessary or inevitable.
- If you are alone with a pupil, ensure that what passes is clearly visible from outside the room. Most rooms at CLSG have glass panels in the door, but it is still advisable to consider whether the door can practically be left open.
- Where there is no glass panel in the door, it is definitely advisable to make sure that the door is open.
- Except when absolutely necessary, for example when assisting a child in PE or when teaching a musical instrument, avoid all physical contact with pupils. If you do need to touch a child, explain in advance that you are going to do so, and why.
- It is certainly necessary to avoid any physical contact when you are alone with a pupil. Sadly, even a consoling hug can be misinterpreted or misrepresented.
- Take care over commenting on a child's appearance. A casual remark can also be misinterpreted or misrepresented.
- Ensure that any supervision in changing rooms is respectful to the child.

GUIDANCE ON TEACHER/PUPIL BOUNDARIES

- It is important to ensure that the school retains its friendly and open atmosphere and that a climate of unwarranted suspicion does not develop.
- Sadly, some children on some occasions either misinterpret or even maliciously misrepresent the behaviour of adults. This is very rare in schools of this type but it has happened and so it is very important to observe appropriate professional boundaries and to avoid putting oneself in a vulnerable position.
- Adolescents can develop "crushes" on their teachers. All teachers need to be aware of this possibility and to seek advice from senior colleagues if they feel that they are being inappropriately focused on by a pupil.
- In addition to exercising caution when seeing pupils there may well be occasions on which it is better to have another colleague with you when you see an individual student, just as at times it is more appropriate not to see parents on one's own.
- Contact between teaching staff and pupils outside school in contexts other than on organised school activities is only very rarely likely to be appropriate. Colleagues should

always consult senior staff about any possible contact of this kind and should always ensure that it is known about and approved of by the child's parents.

- If you are asked to give a child extra tuition or a private lesson in their own home, you should consult your Head of Department before agreeing and the Head of Department will liaise with the Headmistress or Senior Deputy Head (Staff) about the proposed arrangements.
- Inviting a pupil to your own home for extra teaching or any other purpose is fraught with difficulty and is to be avoided.
- It is important to be especially cautious at social occasions at which staff and students are both present. It may be tempting to step out of role at events such as the leavers' ball, but it must be emphasised that pupils remain under our care and on the school roll until the end of the summer holidays after they have left school.
- Even if they are over 18 and are about to leave school, students continue to be "vulnerable people" in terms of safeguarding legislation whether or not they are legally adult and teachers retain their professional obligations towards them. In any case, many of them have younger sisters or friends who will remain in the school and who will gossip about perceived indiscretions in the next school year!
- Staff should never give alcoholic drink to students and should avoid situations in which their presence could be interpreted as permitting or encouraging students to drink.
- Do not be afraid to ask for advice from or to express concern to the DSL or other senior members of staff.

GUIDANCE ON ONLINE BEHAVIOUR AND USE OF ELECTRONIC MEDIA

Staff must follow the City of London Corporation's Social Media policy and the school's ICT code of conduct. The following points give general guidance

- Be extremely careful over the use of Facebook, Instagram. YouTube and any other social media.
- Make sure your privacy settings on social networking sites are at the highest possible level to avoid IT savvy pupils being able to access any private material.
- Never accept a student, parent or a recent leaver as a "friend" on any social media
- If you need students, parents or recent former pupils to contact you via Facebook, Twitter or the like for a school related activity (e.g. for a team or trip), set up a special separate site and let the DSL and Director of ICT know what you have arranged and why.
- Always use your school e mail address and students' school email addresses when communicating with pupils by email.
- For anything apart from the most routine delivery and return of work or any learning-related queries, copy in your HOD or another appropriate colleague to all e mail exchanges with students and parents.
- Use a school mobile phone rather than your private phone for school activities and contacting students and parents. If enough warning is given these can be borrowed from the school.
- Only contact a student on her mobile phone or keep her number on record if there is a real need to do so and make sure that you inform your HOD or another appropriate colleague about why you are doing so.

Apply common sense and professional judgement in all your electronic contacts with students and parents.

ANNEX D

THE PREVENT DUTY

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". From 1st July 2015, all schools and registered childcare providers are subject to this duty and must have regard to the statutory guidance.

The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

Two important concepts in Prevent are "extremism" and "radicalisation". It is argued that terrorist groups often draw on extremist ideology, developed by extremist organisations. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them. The Government has defined extremism in the Prevent strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces".

WHAT DOES THE PREVENT DUTY MEAN FOR SCHOOLS?

In order to fulfil the Prevent duty, schools must be able to identify children who may be at risk of radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of the wider safeguarding responsibilities of schools and it is similar in nature to protecting children from other harms, whether these come from within their families or are the product of outside influences. This appendix therefore must be read in conjunction with the Safeguarding and Child Protection policy.

Schools must also build resilience to radicalisation by promoting fundamental British values and enabling pupils to challenge extremist ideologies. Complying with the Prevent duty should not stop schools debating controversial issues. On the contrary, schools should provide a safe space where pupils can develop an understanding of the risks associated with terrorism and develop the knowledge and skills to challenge extremist arguments.

There are four general duties placed on schools:

1) Risk assessments
   Schools are expected to assess the risk of their pupils being drawn into terrorism, including support of extremist ideas that are part of a terrorist ideology, based on a general understanding of the risks affecting children in their area and a specific understanding of how to identify individual children at risk and offer support.

2) Working in partnership
   Schools are expected to continue to work with Local Safeguarding Children and Community Safety Partnerships and local Prevent Leads.

3) <u>Staff training</u>
   Schools are expected to provide Prevent awareness training to help staff identify children at risk of radicalisation and to challenge extremist ideology.

4) <u>IT policies</u>
   Schools are expected to have suitable levels of filtering to prevent access to material that promotes terrorism and extremist ideologies. Compliance with the Prevent duty falls within school's responsibility to teach e-safety.

HOW THE PREVENT DUTIES ARE DISCHARGED AT CLSG?

Risk Assessments
A significant proportion of CLSG pupils come from London Boroughs which are a Prevent priority 1 or 2, which means that the risk of them being drawn into terrorism is potentially significant. However, only a small proportion of pupils are Muslim. While this does not mean that non-Muslim pupils are not a potential target, they are less likely to be exposed to such a possibility. It is however possible that they may be drawn into a different type of extremism such as far right or far left.

Therefore, the risk of radicalisation at CLSG is potentially high for a small number of pupils and less high for the vast majority.

The risk to individual pupils is monitored through our pastoral structure and in particular the tutors, who take into account all the factors and patterns of behaviour detailed in section 4. Attendance monitoring plays an important part in assessing vulnerability.

We remain alert to the possibility of staff becoming radicalised and watch out for signs of this (e.g. reports from members of the school community). All speakers are vetted to check they are not a risk.

This risk will be reviewed annually as part of our annual Safeguarding review.

Working in Partnership
CLSG works closely with the City and Hackney Safeguarding Children Partnership and with the Community Safety team and its Prevent Coordinator at the City of London Corporation.

Staff Training
As part of the annual INSET on safeguarding, staff receive appropriate training on relevant aspects of the Prevent Duty, including how to identify children at risk of being drawn into terrorism, how to challenge extremist ideologies and what to do if staff become concerned about a child being drawn into terrorism. The Headmistress, the DSL and the DDSL (Prevent Lead) have completed online Prevent Awareness training available at:

http://course.ncalt.com/Channel_General_Awareness/01/index.html.

WRAP training (workshop on raising awareness of Prevent) has been completed by at least the DSL and the DDSL (Prevent Lead). The DDSL (Prevent Lead) is the first source of advice for staff on all matters related to the Prevent Duty.

IT Filter
The school has a strict and effective filtering and e-safety is delivered through both Computer Science and PSHCEE lessons. There is also an E-safety Coordinator who is responsible for all matters of e-safety and keeps a log of incidents and reports annually to the Governors. The Deputy Head (Pastoral) has responsibility for the issuing of sanctions to pupils.

In addition, to fulfil its Prevent Duty, the school undertakes to:

1) Maintain and review annually robust safeguarding policies which take in to account the policies and procedures set out by City and Hackney Safeguarding Children Partnership and incorporate due regard to the Prevent Duty.

2) Conduct due diligence checks on staff, groups or individuals seeking to hire or use school premises, on visitors to school, particularly visiting speakers, whether invited by children or staff and on contractors working on the school site.

3) Actively promote Fundamental British Values as part of the school's wider SMSC/PSHCEE programmes as well as within other subject areas and assemblies.

4) Ensure that no political indoctrination takes place in any of the school curricular or extracurricular activities and that pupils are always exposed to a balanced presentation of political issues.

5) Ensure that children are resilient to radicalisation and are prepared to challenge extremist ideology by providing a safe environment for the discussion of sensitive issues, helping children to understand how they can participate in decision-making.

DDSL (Prevent Lead) Responsibilities

One of the DDSL is the nominated Prevent Lead at CLSG and has responsibilities for the oversight of the discharge of the Prevent Duty at school. Details on the DDSL are in the appendix to the Safeguarding and Child Protection Policy and their responsibilities are as follows:

1) To be the first point of contact for parents, pupils, teaching and non-teaching staff and outside agencies in matters relating to Prevent.
2) To coordinate the Prevent Duty procedures in the school.
3) To undergo appropriate training (including WRAP).
4) To maintain an ongoing training programme on Prevent related issues for all staff.
5) To liaise with the local prevent coordinator, the police, local authorities and other agencies.
6) To keep appropriate records of Prevent related incidents.

PROCEDURES OF VETTING VISITING SPEAKERS

Visiting speakers invited by either staff or girls must be vetted prior to the invitation being issued to them. If a pupil is inviting the speaker, the member of staff sponsoring the activity must carry out the checks. Staff should complete the CLSG Visiting Speakers safeguarding checklist (available on the shared area) and submit it to the Senior Administrative Officer and the DSL. Details of the checks on visiting speakers are recorded on the SCR.

HOW TO SPOT A CHILD VULNERABLE TO RADICALISATION: VULNERABILITY ASSESSMENT

"There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a "profile" can be misleading." (Channel Guidance)

The Channel Vulnerability Assessment Framework (April 2015, Annex C) suggest 22 indicators. The framework involves three dimensions: engagement, intent and capability.

Engagement with a group, cause or ideology ("psychological hooks")

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues.

Intent to cause harm or readiness to use violence

- Over-identification with a group or ideology
- 'Them and Us' thinking
- Dehumanisation of the enemy
- Attitudes that justify offending• Harmful means to an end
- Harmful objectives

Capability to cause harm

- Individual knowledge, skills and competencies
- Access to networks, funding or equipment
- Criminal Capability

Some pupils will be more vulnerable to be influenced by others because of the existence of one or more factors, which may include:

- An identity crisis, involving an individual's distance from their cultural/ religious heritage, including peer/ family/ faith group rejection
- A personal crisis, including family tension/ social isolation/ friendship issues
- Personal circumstances, such as migration, experience of racism
- Unmet aspirations
- Criminality
- Experience of poverty, disadvantage, discrimination or social exclusion

The following are further risk indicators:

- Racist graffiti/ symbols/ comments made in School
- Speaking out or writing in favour of extremist ideas in school work
- Extreme comments shared on social media
- Erratic attendance patterns, including travel for extended periods of time to international locations known to be associated with extremism
- Distribution of extreme or terrorist propaganda among other pupils
- Association with those known to be involved in extremism (including via the internet)
- A significant shift in the child/ young person's behaviour or outward appearance, particularly involving conflict with his/her family and/or faith group
- A simplistic or flawed understanding of religious/ political/ global issues
- A significant adult or other in the child/ young person's life who has extremist views or sympathies

Critical risk factors include:

- Contact with extremist recruiters
- Articulation of support for extremist causes/ leaders
- The possession of extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Membership of extremist organisations

All staff and in particular pastoral staff need to be alert to the signs described above in their interactions with pupils. Monitoring of attendance by tutors and Heads of Year is a crucial part of detecting potential radicalisation.

CHALLENGING EXTREMIST IDEOLOGIES

"All terrorist groups have an ideology. Promoting that ideology, often through the internet, facilitates radicalisation and recruitment. Challenging ideology and disrupting the ability of terrorists to promote it is a fundamental part of Prevent.

In addressing ideological issues, we also need to be very clear about our purpose and method. The great majority of people in this country find terrorism repugnant and will never support it. Work to challenge ideology should not try to change majority opinion because it does not need changing. Our purpose is to reach the much smaller number of people who are vulnerable." (Prevent Guidance)

The school ensures that no political indoctrination takes place at school and that pupils are always exposed to a balanced presentation of political views both in lessons, and in extracurricular activities. The school has a vetting procedure for visiting speakers and has due regard to the Prevent duty in its lettings policy.

The school also builds resilience to radicalisation by providing a broad and balanced curriculum that promotes the spiritual, social, moral and cultural development of pupils and within this, fundamental British values and by providing a safe environment where pupils can discuss sensitive issues and learn how to participate in decision making. Pupils will be taught in PSHCE information and skills to keep safe from harm of all types and who to turn to for help. In addition the PSHCE curriculum will continue to challenge students to be critical of media, including social media and provide key counter-narratives to extremist ideology, through resources such as the Community Response to Extremism DVD, London Grid for Learning and Inspire.

The school will continue to encourage learning through diversity by promoting the objectives of the Equalities Act 2010.

The Religion, Philosophy and Ethics department at CLSG can help challenge extremist ideologies by including lessons at KS3 and KS4 on the difference between Islam and Islamic Extremism, building on the schemes of work that are already in place. It will also continue to challenge any "Islamophobic" feelings by giving a balanced and objective overview of the main precepts of all the major religions.

Promoting critical thinking skills across all subjects remains central to challenging any form of extremism.

If staff encounter expressions of extremist ideology in their lessons, they should challenge the views and correct any factual misconceptions; however it is very important that this is done in a non-judgmental way that encourages further dialogue. Therefore, it is advisable to engage the

student with open questions, using conditional rather than absolute language. This can either be done during the class discussion or on a one-to-one basis after the lesson has finished.

WHAT TO DO WHERE THERE ARE CONCERNS ABOUT A PUPIL

Concerns about a child being vulnerable to radicalisation and extremism should be reported promptly following the usual procedures as detailed in the Safeguarding and Child Protection policy. Staff should bring their concerns to the attention of the DSL or the DDSL (Prevent lead) in the first instance but are also entitled to contact the LADO or the Prevent Coordinator at the Community Safety Team of the City of London directly. Details of how to contact the LADO and the Prevent Coordinator are in the Safeguarding and Child protection policy appendix.

Records will be kept by the DDSL of all concerns and she will liaise with outside agencies as appropriate in line with the Safeguarding and Child Protection Policy.

For children perceived to be at immediate risk of harm, the LADO will be contacted immediately. For children who show early signs of being vulnerable to radicalisation and who need further support, the school will make a Channel panel referral, in consultation with the LADO and the Prevent Coordinator in the Community Safety Team.

If a child is suspected or identified as already engaged in illegal terrorist related activity, they will be reported to the police. The following are useful contact numbers; Anti-Terrorist Hotline: 0800 789 321, Crime stoppers: 0800 555 111, Relevant Police force: 101.

Staff and governors may also use the DfE dedicated helpline and mail box for non-emergency advice: 0207 340 7264 and counter-extremism@education.gsi.gov.uk

ANNEX E
CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also involve a wider group. Children who are victims of sexual violence or harassment will likely find the experience stressful and distressing and it can adversely affect their educational attainment. Sexual violence and harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. Children with SEND are disproportionately likely to be victims of sexual violence or harassment. Children who are perceived to be lesbian, gay, bi or trans (LGBT) can be targeted by their peers, even if such an attribution is wrong.

Sexual harassment can be defined as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity and/or make them feel intimidated, degraded or humiliated.

Sexual harassment can include:

- Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about appearance and calling someone sexualised names;
- Sexual "jokes" or taunting
- Displaying pictures of a sexual nature
- Online sexual harassment which might include non-consensual sharing of images, bullying and sexual exploitation, coercion and threats.
- "Upskirting", which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.

Problematic, abusive and violent sexual behaviour may cause developmental damage. Harmful sexual behaviour can occur online and/or offline.

Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma and it is important that they are offered appropriate support and education.

The PHSCE programme offers an age-appropriate curriculum educating pupils about what constitutes a healthy relationship and the nature of consent. In addition, all staff should challenge any homophobic teasing or banter or other inappropriate sexual discussion

RESPONDING TO INCIDENTS OF SEXUAL VIOLENCE OR SEXUAL HARASSMENT.

In this school, incidents of violence are rare and sexual violence has not been a problem, however, we remain alert to the possibility that this could occur. It is more likely that we would have to support a victim of sexual violence who had been abused by a pupil at another school. In cases of sexual violence, action would be taken in line with the procedures set out in the rest of this policy, referring the case to children's social care and the police if a crime has been committed. Where the abuse involved online illegal images of children, these will not be viewed or forwarded unless absolutely unavoidable and in these cases two members of staff should be involved in the decision.

Sexual Harassment is a more likely scenario. If the threshold for early help or statutory intervention is not reached, the management of these cases will follow the Anti bullying policy. The school response will be underpinned by the principle that sexual violence and harassment is never acceptable and will not be tolerated. All concerns and discussions and decisions will be recorded.

Consideration must be given to the wishes of the victim who may ask that no one else is told. However, the DSL may judge that it is in the best interests of the child to inform others either to protect the victim or safeguard others. As a rule, parents should normally be informed unless to do so would put the victim at greater risk.

Depending on the seriousness of the allegation, consideration should be given to ensuring the victim and the perpetrator are not in the same classes at least until the issue has been investigated and action taken.

The needs and wishes of the victim should be paramount so they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine so school is a safe place for them.

If it is clear that ongoing support will be required, the victim should be asked to name a trusted adult whom they can talk to about their needs.

Consideration also needs to be given to the needs of the perpetrator. Although it is highly likely that sanctions will be both justified and deserved, it might be helpful to involve the school counsellors or external professionals to understand why they have acted in this way. Sanctions should be balanced with a consideration of the broader picture and should be decided on a case by case basis. Parents of the perpetrator would normally be informed about what has happened but this would depend on the specific circumstances.

Action may also need to be taken to minimise reports spreading more widely and to avoid other children 'taking sides'. Social media is likely to play a central role and how to prevent or minimise the impact of this should be considered.

There are useful sources of support listed in Sexual violence and sexual harassment between children in schools and colleges, May 2018.

ANNEX F

CRIMINAL EXPLOITATION OF CHILDREN

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs exploiting children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

All staff are made aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

County lines exploitation can affect any child under the age of 18 years. It can still be exploitation even if the activity appears consensual, can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. County lines exploitation can be perpetrated by individuals or groups, males or females, and young people or adults and is typified by some form of power imbalance such as age, gender, cognitive ability, physical strength, status, and access to economic or other resources.

SERIOUS VIOLENCEAll staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

ANNEX G

PROCEDURE FOR DEALING WITH SELF-HARM

Introduction

Recent research indicates that up to one in ten children in the UK engage in self-harming behaviours. Schools can play an important role in preventing self-harm and also in supporting students, peers and parents of students currently engaging in self-harm.

Scope

This document describes the school's approach to self-harm. This document is intended as guidance for all staff including teachers and support staff.

Aims
- To increase understanding and awareness of self-harm
- To alert staff to warning signs and risk factors
- To provide support to staff dealing with students who self-harm
- To provide support to students who self-harm and their peers and parents/carers

Definition of Self-Harm

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body
- Scouring or scrubbing the body excessively

Risk Factors

The following risk factors, particularly in combination, may make a young person particularly vulnerable to self-harm:

- Individual Factors:
  - Depression / anxiety
  - Poor communication skills
  - Low self-esteem
  - Poor problem-solving skills
  - Hopelessness
  - Impulsivity
  - Drug or alcohol abuse

- Family Factors:
  - Unreasonable expectations
  - Neglect or physical, sexual or emotional abuse
  - Poor parental relationships and arguments
  - Depression, self-harm or suicide in the family

- Social Factors:
  - Difficulty in making relationships / loneliness
  - Being bullied or rejected by peers

Warning Signs

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should always be taken seriously and staff observing any of these warning signs should seek further advice from the Designated Safeguarding Lead (DSL) for safeguarding children - Deputy Head (Pastoral) Susannah Gilham, or in her absence Justine Venditti, the Senior Deputy Head (Staff), or in her absence, Rosie LockyearMadeleine Garnham, Head of Senior Schoolixth Form.

Possible warning signs include:

- Changes in eating / sleeping habits (e.g. student may appear overly tired if not sleeping well)
- Increased isolation from friends, becoming socially withdrawn
- Changes in activity and mood e.g. more aggressive or introverted than usual

- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing

<u>Staff Roles in working with students who self-harm</u>

Students may choose to confide in a member of school staff if they are concerned about their own welfare, or that of a peer. School staff may experience a range of feelings in response to self-harm in a student such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to students it is important to try and maintain a supportive and open attitude – a student who has chosen to discuss their concerns with a member of school staff is showing a considerable amount of courage and trust.

Students need to be made aware that it may not be possible for staff to offer complete confidentiality. If you consider a student is at serious risk of harming themselves then confidentiality cannot be kept. It is important not to make promises of confidentiality that cannot be kept even if a student puts pressure on you to do so.

Any member of staff who is aware of a student engaging in or suspected to be at risk of engaging in self-harm should consult the DSL – the Deputy Head (Pastoral), Susannah Gilham or in her absence Justine Venditti, the Senior Deputy Head (Staff), or in her absence, ~~Rosie~~ Madeleine Garnham ~~Lockyear~~, Head of Senior School~~ixth Form~~.

Following the report, the designated teacher will decide on the appropriate course of action. This may include:

- Contacting parents /carers
- Arranging professional assistance e.g. from the school nurse, social services
- Arranging an appointment with a counsellor
- Immediately removing the student from lessons if their remaining in class is likely to cause further distress to themselves or their peers
- In the case of an acutely distressed student, the immediate safety of the student is paramount and an adult should remain with the student at all times
- If a student has self-harmed in school a first aider should be called for immediate help

<u>Further Considerations</u>

Any meetings with a student, their parents or their peers regarding self-harm should be recorded in writing including:

- Dates and times
- An action plan
- Concerns raised
- Details of anyone else who has been informed

This information should be stored in the confidential child protection file.

It is important to encourage students to let you know if one of their group is in trouble, upset or showing signs of self-harming. Friends can worry about betraying confidences so they need to

know that self-harm can be very dangerous and that by seeking help and advice for a friend they are taking responsible action & being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult the designated teacher for safeguarding children. When a young person is self-harming it is important to be vigilant in case close contacts with the individual are also self-harming. Occasionally schools discover that a number of students in the same peer group are harming themselves.

Related School Policies and Procedures

- School Statement on Confidentiality
- Confidential Counselling Service Information
- Anti-Bullying Policy
- Child Protection Policy
- Drugs and Substance Abuse Policy
- First Aid Policy and Annexes
- Health and Safety Policy
- Pastoral Care, Discipline and Exclusions Policy
- Behaviour Management Policy

CLSG Pastoral Referral Procedure

• Teacher/Parents/Pupil request for student support to Teacher/Form Tutor/HOY.

1st Tier of Referral

• In the case of **routine, day to day queries** the **Form Tutor** should ideally always be the first point of contact.
• If the matter is considered to be of a **more complex nature** the HOY and/or HOS should be notified. They will identifiy the most appropriate pathway of support for student *(this could be a combination from the list below):*
• a) Form/Subject Teacher   b) PSCHEE/Asemblies c) Subject Clinic   d) 6th Form Mentor   e) School Counsellor f) School Nurse   g) 1:1 session with specialist SEND teacher/assessor h) Designated Safeguarding Lead (DSL) or Deputy DSL (DDSL) i) External agencies e.g. GP, CAMHS etc j) Parents

2nd Tier of Referral

• **Deputy Head Pastoral Referral (SGI)**
• Referrals to the Deputy Head Pastoral should ideally only come from the HoS of the pupil concerned.following consultation with the form tutor and the HoY
• **Potential Child Protection Referral**
• Any matter relating to a child protection matter concerning a pupil should be made IMMEDIATELY to **SGI (DSL), JV (DDSL) or MG (DDSL)** or if appropriate the Local Authority Designated Officer (LADO) with the City of London Corporation (COL) currently **Pat Dixon on 020 7332 1215 or pat.dixon@cityoflondon.gov.uk. All information in respect of the matter will be cascaded on a needs to know basis only.**
• See Appendix 1 for the Indicator Guide of the type of circumstances which would lead to a Child Proection referral overpage)

3rd Tier of Referral

• **DSL/DDSL or in the event of their absence another member of SMT making a Child Protection Referral (Please refer to the CLSG Safeguarding and Child Protection Policy on the Portal):**
• Make contact with the LADO in COL for advice on how to proceed.
• Inform Head and Deputy Head Pastoral of the developments
• If advised make contact with the Prevention and Early Intervention Services team for the pupil's Local Authority Social Services in which that pupil normally resides
• If advised , complete a Pre-CAF (Common Assessement Form) and send to the duty email address once the referral has been made

4th Tier of Referral

• **What happens once a referral to Social Services is made?**
• You will be contacted within 24 hours of your referral and further information may be required to determine how best to proceed
• If a CAF is required someone from the relevant Social Services Team and Pat Dixon's Team in COL will support you
• Once the CAF is completed you will be contacted by the relevant Social Service Team for the pupil concerned

Issues which would prompt a Child Protection referral

The following is an indicator guide of the type of circumstances which would lead to a S47 assessment:

- Any allegation or suspicions about a serious injury/sexual abuse to a child
- Inconsistent explanation or an admission about a clear non-accidental injury
- A child being traumatised injured or neglected as a result of domestic violence.
- Repeated allegations involving suspicions of serious neglect
- Direct allegation of sexual abuse made by a child or abuser's confession to such abuse
- Any allegation suggesting connections between sexually abused children in different families or more than one abuser
- An individual (adult or child) posing a risk to children, any suspicious injury or allegation involving a child subject to a current child protection plan or looked after by a local authority
- No available parent and child vulnerable to significant harm
- Suspicion that child has suffered or is at risk of significant harm due to fabricated or induced illness,
- Child subject to parental delusions
- A child at risk of sexual exploitation or trafficking
- Pregnancy in a child aged under 13
- A child at risk of FGM, honour based violence abuse or forced marriage.

Revised: September 2016, June 2017, September 2018, January 2019, September 2019, September 2020
Approved by the Board of Governors: October 2018
To be reviewed by: June 2019

Signed by the Chairman of Governors   Date: October 2018

CITY OF LONDON SCHOOL FOR GIRLS

PUPIL SUPERVISION POLICY

Policy reviewed by:	Justine Venditti, Susannah Gilham, Rosie Lockyear, Rachel Hadfield
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

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This policy should be read in conjunction with:

- Attendance Policy
- Educational Visits Policy
- Health and Safety Policy
- Pupil Code of Conduct
- Parents' Handbook for Y7 – Y13
- Prep Parents' Handbook
- Staff Handbook
- First Aid Policy
- Missing Child Policy

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1. Introduction

1.1 City of London School for Girls is fully committed to ensuring the safety and proper supervision of all pupils throughout the school day and at all other times when pupils are under the care of the school, both on and off the School site.

1.2 This policy has regard to Part 3 (Welfare, health and safety of pupils), of the Independent School Standards Regulations.

2. Contacting the school during the school day

2.1 The School's Reception and switchboard is manned from 8~~7~~.00am~~30am~~ until 6.00pm in term time during the school day. The receptionist answers phone calls, responds to emails, passes on messages to pupils and staff and deal with enquiries from visitors during this time. At other times, messages may be left on the School answer phone, or members of staff may be contacted by email. The reception telephone number is 0207 847 5500.

3. Pupils' arrival

3.1 The School opens for pupils at 8.00am. Pupils may not enter the school before this time unless they are participating in an activity organised and supervised by a member of staff. Pupils participating in activities must sign in at reception and the organising member of staff must leave a list of the names of those participating at reception.

3.2 Sixth Formers, and pupils who have a front door pass, for example because they have a medical condition, can enter via reception. A member of staff supports the receptionist before school starts, according to a rota.

3.2 All other pupils must enter via the Prep Roof Gate from the Podium. This gate opens between 8.00 and 8.40am and is manned by a member of the premises staff who monitors entry and provides security.
*During C19 pupils are allocated different entrances and times to allow for staggering arrivals and departures.

3.3 ~~3.4~~ Prep pupils make their way down onto the Prep corridor (with a Prep member of staff stationed on the stairs for supervision). From the corridor, pupils make their way onto High Grass where they are supervised by two staff members (one teacher, one TA) until 8.40am when they come in for registration. Additionally, there is a member of staff (usually the Head or Deputy Head of Prep) on the Prep Corridor from 8.00am to greet and supervise pupils as they make their way outside. Prep parents drop their daughters off at the blue gate and do not come into school via that entrance. In the Senior School there is a member of staff on walkabout duty from 8.00am – 8.40am each day.

4. During the school day

4.1   Registration

As outlined in the Attendance Policy, all pupils in Years 7 – 13 are registered at 8.40am and 1.50pm, except on Mondays when afternoon registration is at 1.30pm. Prep are registered at 8.40am and 1.20pm, except Mondays when afternoon registration is 12.50pm.
*During C19 to allow for commuting, all lessons follow Monday timings with registrations at 8.40am and 1.30pm.

Sixth Formers are allowed one regular "free morning" or "free afternoon" a week which means they can miss that one registration session each week. These are logged with the students' form tutors. In the rare circumstances that a morning sixth form lesson is cancelled in advance owing to staff absence, students may seek permission from their Head of Year to come into school late. This information is passed on to the student's tutor so the registers are accurate.

Instructions for parents about how to inform the School of a child's absence before morning registration are set out in the Attendance Policy and are reproduced in the Parents' Handbook and Prep Parents' Handbook.

If a pupil is absent without explanation, their parents will be contacted to ascertain the reason for their absence. If the school is unable to contact the missing child's parents, we will follow the Procedures set out in our Missing Child Policy.

If pupils are late arriving to school, they should sign in at reception before joining their tutor group or subject classes. Year 3 pupils should wait in reception until they can be escorted to Prep by a member of the Prep staff.

4.2   In class and moving around the building

Pupils wishing to leave a lesson for any reason must ask permission from the teacher.

- Pupils are not normally permitted to leave lessons or tutor periods on their own, except briefly and for good reason
- If they need to see the School Nurse, in the case of younger pupils, the teacher may arrange for them to be escorted, either by another pupil or in the case of Prep pupils, by a Classroom Assistant.
- In certain medical situations girls may be allowed to leave the classroom at will; staff are made aware of particular arrangements.

It is not normal practice for a pupil to be sent out of class for bad behaviour. Very rarely, it may be in a pupil's best interest or in the interest of the rest of the class for a pupil to be sent out of a lesson because they are interrupting the learning of others or because they are upset.

When this occurs, the teacher will always send the pupil to wait outside the Headmistress's office, where there is always an adult presence and will take steps to inform the Deputy Head (Pastoral) and Head of Year as soon as possible that the pupil has been sent out of class.

Some girls in the Senior School with complex pastoral needs may be issued with a 'time out card'. This enables them to leave lessons without explanation. The girls must report to ~~Reception~~ designated location where a member of staff~~who~~ will alert members of the pastoral team. One of these will come and assist the girl concerned. ~~Reception keeps a log of girls using the time out system.~~

4.3   Private study periods

Year 12 and 13 lessons are also not normally covered by another teacher for short term staff absence and most Sixth Formers have regular private study periods. Sixth Formers are expected to use their private study time profitably, working in the Sixth Form Centre or the Library. Sixth Formers who have no lessons after lunch and whose work is of an appropriate standard may be granted a private study afternoon, for which they may sign out and leave school. Sixth Formers use of non-contact time is monitored by their tutors and the Head and Assistant Head of Sixth Form as part of the overall monitoring of their academic progress.

4.4   Teacher absence from lessons

In the case of teacher absence, lessons in the Prep and in Years 7 – 10 are always covered by another teacher. Year 11 lessons are not usually covered for short term teacher absence unless they are timetabled in a laboratory or some room where pupils are only admitted under supervision. Instead, Year 11 classes are trusted to undertake work unsupervised.
*During C19, to avoid moving mixing zones those in labs will be covered and those being taught remotely will be covered when possible.

4.5   Outside lesson time

All members of the teaching staff and support staff take their share of supervisory duties according to a rota.

At break and lunchtime members of staff are on duty patrolling the premises, as well as supervising entrances and exits and the start and end of the day.

Prep pupils are supervised by the Classroom Assistants and there is one member of the Prep teaching staff on duty on each day.

4.6   Medical assistance

The School Nurse is on duty throughout the school day. If she cannot be found in the medical room, for example because she is attending to someone elsewhere in the building, she can be contacted by radio via Reception.

First aid boxes and defibrillators are in all potentially high risk areas, as well as in the Medical Room.

A number of members of the teaching and support staff are First Aid trained and can also assist sick or injured pupils when necessary. Lists of First Aiders are posted on the medical room door and in the staffroom. The Receptionist can also contact First Aiders if necessary. Staff who have not been trained in First Aid or other medical procedures are still expected to behave reasonably in the event of an emergency, e.g. by calling the emergency services immediately and informing (or arranging to inform) the parent / career of the pupil concerned. Further information is available in the First Aid Policy.

5. Changing rooms and toilets

5.1   Staff may enter the pupils' changing rooms and toilets for the purpose of 'respectful supervision'. Before entering the changing room/toilet, staff must announce their intention to knock loudly on the door and shouting at a suitable and decent volume that that they are about to enter. Where possible, a member of staff entering a changing room/ toilet should be accompanied by another member of staff.

5.2   'Respectful supervision' is defined by warning the pupils of entry and averting eyes from any pupils in a state of undress, the intention being to monitor standards of behaviour In so doing, staff may remain in the changing room/toilet for a maximum of five minutes.

6. Pupils' departure at the end of the school day

6.1   Pupils in the Prep department leave school at 4pm (3.35pm on Mondays). They may stay beyond this time if they are attending a PE club or fixture, or if they are attending 'Evening Supervision' where girls are supervised by a member of Prep support staff until 6.00pm. This takes place in a Prep classroom and there is a charge for attending.

All Prep pupils are signed out as they leave Prep at the end of the day. Prep pupils must be collected from the Prep Roof at 4pm (3.35pm on Monday) by a parent, designated adult, older sibling (Senior School) or travel buddy (Senior School). Prep parents or carers come onto the Prep Roof via the Prep roof gate, but are not permitted to enter the school building.

Girls who are travelling home on a parent organised coach will meet the coach driver on the Prep roof.

Parents should inform the Prep administrator of any changes to their daughter's end of day routine no later than 3.00pm via email (prepadmin@clsg.org.uk).

The Prep roof gate remains open for ten minutes. Should parents be running late, they should make their way to main reception. In the meantime, their daughter will be taken to Evening Supervision (on the Prep corridor). Evening Supervision runs until 6.00pm

and parents will be invoiced for any sessions attended. Parents should ensure they arrive no later than 6.00pm to collect their daughter. Parents who arrive after 6.00pm will be charged £10 per ten minutes that they are late.

Girls in Year 6 are allowed to travel home unaccompanied in their last term in Prep. Parents must email the Head of Prep to confirm their daughter's independent travel arrangements and complete a form that includes their daughter's travel route and mobile telephone number.

6.2   For Years 7 – 13, the regulations for departure at the end of the school day are as follows:

Unless they are participating in a staff led and supervised after school activity, all students must leave the school premises by 4.15pm (by 3.50pm on Mondays), except in the circumstances set out below:

- Sixth Formers may work in the Sixth Form Centre or Library until 5.30pm, provided that they have notified the Sixth Form Office and Reception by email that they are doing so

- Girls in Years 7 – 11 who need to collaborate on project work or who have some other exceptional work-related need to study in school, may go to the library, sign in with the Assistant Librarian and work there until 5.15pm. Students wishing to work in the library after 4.00pm must have prior approval from their parents or Head of Year

- Girls in Years 7 – 11 who are remaining in school because they are attending a play or concert later in the evening may go to B9 or B11 to work in the interval between the end of lessons and the beginning of the performance

*During C19 there is a staggered exit from the school site at the end of the day from various exits between 3.30 – 4.00pm.

7. Pupils who are not collected following after school activities

7.1   It is our expectation that girls in Years 7 and above will make their own way home following after-school activities, unless a parental request to the contrary has been made.

7.2   If pupils are not collected as expected, we will attempt to contact the parents and if we cannot do this we will use our best judgement as to whether to keep the child in school or allow them to leave.

7.3   The school site closes at 6.30pm and activity staff will wait with girls if they are to be collected after this time and if it is not deemed safe for them to go home alone.

8. Supervision whilst travelling to and from school

Parents are responsible for ensuring that their children travel safely to and from school.

9. Supervision during off-site activities and educational visits

9.1   When pupils are involved in authorised activities off-site, potential risks must have been identified, and control mechanisms devised, through risk assessment procedures prior to the visit. Appropriate emergency procedures must also have been identified and be known by the staff supervising the activity.

9.2   Details of supervision of pupils on educational visits are set out in the school's Educational Visits Policy. The ratio of supervising adults to participating pupils will always accord with DfE guidelines, as set out in the policy.

10. Areas restricted and out of bounds to pupils

10.1   Areas which pupils must not enter unsupervised and equipment they may not use except under adult supervision are set out in the Pupil Code of Conduct.

10.2   We ensure that pupils do not have unsupervised access to potentially dangerous areas, such as the Science Laboratories, the gym, the pool and the kitchens and the rooves. Clear signs are displayed where pupils may not enter a room and where possible doors to these areas are kept locked when not in use. All flammables and chemicals are kept securely locked in appropriate storage facilities.

        Pupils are expected to follow all reasonable instructions given to them by School staff, including instructions (written or verbal), which state than an area should not be accessed.

11. Security and access control

11.1   All staff and Sixth Formers sign in and out with their electronic access card when entering or leaving the premises. Pupils in Years 9-11~~3~~, where such permission has been granted, may leave the site for lunch. Years 12-13 who leave the School site during the school day are also required to sign in and out at Reception.

11.2   Visitors are required to sign in and out at Reception and should be escorted at all times when in school. Contractors will be accompanied if necessary. During the school day entry to the building is via reception only and automatic doors prevent anyone going

beyond reception until their entry has been approved and recorded. Visitors are expected to wear a visitor's badge created when they login. In the absence of uniform, sixth formers and members of staff are required to wear an ID card so that they can be easily identified.

Regulations and arrangements regarding security and lone working are set out in the school's Health and Safety Policy.

12. Physical contact with pupils

12.1   While it is unlawful to allow any form of restraint to be used as either a disciplinary action or punishment, it is permissible to use reasonable force in circumstances where:

- a pupil (or pupils) may injure themselves or others
- good order may break down as result of the pupil's/pupils' behaviour
- a criminal offence has been committed

12.2   As such, in the course of their supervision of pupils, staff may have cause to make physical contact with a pupil (or pupils). Any occasion where such force is used must be recorded and reported appropriately. Where an incident occurs where restraint is required, staff must remain cognisant of their duty of care to the pupils not taking part in the incident.

13. Staff Induction

13.1   All new members of staff with relevant supervisory responsibilities receive induction into the School's expectations of the appropriate levels of pupil supervision. Guidance is given about what to do when on duty outside normal lesson times and training is given for whilst on Educational Visits.

CITY OF LONDON SCHOOL FOR GIRLS

PREDICTED GRADES POLICY

Policy last reviewed by:	Georgie Hankinson, Eleanor Perkins
Date last reviewed:	September 2020
Approved by:	
Date approved:	

Predicted A-Level grades are an extremely important part of monitoring performance in the Sixth Form and are an integral part of the process of supporting applications for Higher Education and other opportunities beyond school.

- A-Level predictions are based on the professional opinion of the staff by reference to evidence of performance, achievement and potential.

- A-Level predictions are provided on two occasions in the Sixth Form:-

    o The first occasion is as Internal Predictions in January of Year 12. These predictions are to help students and their parents make an informed decision about their Year 13 choices.

    o The second occasion is as Final Predictions in June of Year 12. These are accompanied by teachers' UCAS subject references. These predictions are included in the students' UCAS and Higher Education applications.

- Revisions to predicted grades may only be made after these dates in exceptional circumstances.

- It is school policy to ensure that parents and pupils know the predictions, the reasons for them and any remedial action that may be recommended in the light of these predictions.

- Year 12 internal exams will be taken into account when teachers make final predictions, but achievement in the internal exams should not be presumed to be the same as the predicted grade at A-level. A predicted grade at A-level could be lower or higher than that achieved in the Year 12 internal exams. The second year of A-level courses are more demanding and staff take this into account.

- The precise nature and weighting of the evidence on which predictions are based is at the discretion of individual departments but it will normally include all aspects of classwork including attendance and punctuality in completing assignments, homework, tests and examinations.

- The policy for predicted grades for international applications follows the guidelines above, remaining the same as for all UK applications.

CITY OF LONDON SCHOOL FOR GIRLS

FIRE SAFETY POLICY AND PROCEDURES

Policy last reviewed by:	Jane Elliott-Waine
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

Contents

1. Introduction

1.1 This document sets out our arrangements for controlling fire risk at City of London School for Girls (CLSG). It has been written with regard to the Regulatory Reform (fire Safety) Order (RRO) 2005, as well as the City of London's Corporate Fire Policy and as stated in that document the Headteacher and the Facilities Manager act as the Responsible Persons.

1.2 Our priority is to take all reasonable precautions to minimise the risk to life and to reduce injury through the implementation of appropriate risk assessment, management plans, protective measures, training / instruction and monitoring. The aim of the fire safety procedures is to ensure that clear guidance is given to ensure that our school community can respond calmly and effectively if fire breaks out.

1.3 The policy has regard to the Government's guidance *Fire safety in new and existing school buildings* (2014):

"Schools are required to undertake risk assessments to identify the general fire precautions needed to safeguard the safety of occupants in case of fire, including their safe means of escape.

Under the Regulatory Reform (Fire Safety) Order 2005 (RRO) fire legislation has become simplified. The Department for Communities and Local Government has produced a guide for schools (fire safety risk assessment: educational premises). The guide deals with the provision and management of fire safety.

You will need to:
- *ensure procedures are in place to reduce the likelihood of fire*
- *maintain fire detection and alarm systems*
- *ensure staff and pupils are familiar with emergency evacuation procedures*

It is important that:
- *fire risk assessments are kept up to date*

fire precautions remain current and adequate (they should be reviewed in detail when significant alterations are made to a school's premises)"

1.4 The Facilities Manager acts as Fire Safety Coordinator, who is supported by the Bursar in implementing this Policy.

1.5 The policy covers the following areas:
- Fire Safety Responsibilities
- Fire Prevention
- Fire Risk Assessment
- Evacuation Plans
- Prevention of Arson

2.   Responsibilities

2.1   The Head
The Headmistress is accountable for fire safety matters at CLSG. She works with the Bursar and Facilities Manager to ensure that the school meets its legal obligations and is responsible for ensuring that:

- Procedures are in place to implement the requirements of the CoL Corporate Fire Policy. In particular, she is accountable for ensuring that fire risk assessments and fire management plans are in place for CLSG;
- The requirements of this fire safety policy and procedures are made known and available to the whole school community;
- Adequate resources are available for fire prevention and fire precautions;
- Responsibilities for fire prevention/precautions are clearly identified and assigned;
- Appropriate instruction and training are provided to staff and pupils.

2.2   The Facilities Manager
The Facilities Manager, accountable to the Bursar, is responsible for ensuring that:

- A suitable and sufficient fire risk assessment (FRA) is carried out every 5 years by a CoL approved assessor, in line with all CoL FRA guidance and that control measures implemented;
- Fire risk assessments are reviewed yearly and that the CoL Fire Safety Teams Mandating requirements are met;
- Fire procedures and risk assessments are reviewed on each occasion that a building is altered, extended or rebuilt, or when new buildings are acquired;
- A fire management plan is in place, following CoL guidance and that this is communicated to all relevant stakeholders;
- Systems are in place to maintain and test all fire safety equipment i.e. fire doors, alarms systems, emergency lighting, as set out in the CoL Fire Safety Policy and that appropriate records are kept;
- Adequate means of escape are provided for all employees including those with disabilities and all other school users;
- Adequate number of fire marshals are identified and appropriately trained;
- Information, instruction and training is provided to all staff and pupils;
- Everyone in the school (including visitors and contractors) are given clear written instructions on what he/she should do in the event of fire;
- Records are kept of the fire induction training given to new staff and pupils;
- Procedures and arrangements for emergency evacuation are tested termly, recorded and lessons learnt;
- The premises fire logbook is maintained and kept up to date;
- Hot works are assessed, and hot works permits are in place;
- That a Guest Emergency Evacuation Plan (GEEP) is in place and that there is a system in place for Personal Emergency Evacuation Plans (PEEPs) to be developed for staff and pupils where necessary;
- Fire incidents and unplanned activation of the fire alarm systems are reported to CoL as described in the CoL Fire Safety Policy .

2.3   **Heads of Department and Designated Manager**
Heads of Department and Designated Managers are responsible for ensuring that:
- Information regarding fire safety and emergency procedures are provided to new staff on their first day of employment as part of the induction process;
- Fire safety procedures are observed within work locations and risk assessments for activities under their control include any necessary local fire precautions;
- Managers with responsibility for electrical or networks installations, or where highly volatile or flammable substances are used must ensure that fire arrangements and good housekeeping are maintained so as to minimise fire risk.

2.4   **Responsibilities of teaching staff**
- Teaching staff are responsible for escorting their pupils safely out of the building in silence and in an orderly fashion.
- They are responsible for taking the register at the assembly point (or if not a form tutor/deputy keeping the girls silent), and for ensuring that the name of anyone who cannot be accounted for (and, if possible, their likely location) is passed immediately to the Premises Team or SMT. It is the responsibility of the Facilities Manager/SMT to ensure that this information is passed to the Fire and Emergency service as soon as they arrive.

2.5   **All Staff**
All CLSG Employees are responsible for ensuring that:
- They are aware of the fire safety arrangements for CLSG, are fully conversant with the emergency evacuation procedures and assembly point;
- When the fire alarm sounds that they 'sweep' the building as the leave to ensure that all building users are safely evacuating as detailed in the fire procedures;
- They do not increase fire risks by following poor housekeeping and/or waste disposal practices;
- They do not tamper with or misuse any fire safety equipment, including blocking fire exits, propping open fire doors, moving fire extinguishers / blankets, removing signs or notices or blocking call points from clear view;
- Report dangerous situations or fire risks to their manager, the Facilities Manager and the Compliance Manager.

2.6   **Pupils, contactor and other persons**
- Form tutors and CLSG Managers will ensure that all pupils, contractors and other persons that attend CLSG are made aware of the current arrangements for emergency evacuation and that they must obey all fire safety instructions;
- Pupils, contractors and other persons must report any fire incidents, however small, and any concerns they may have about fire safety to the Facilities Manager

2.7   **Fire marshals**
The Premises Team are the designated Fire Marshals for the school. All Fire Marshals are "competent persons" who have been trained to provide "safety assistance" in the

event of a fire. Fire Marshals receive regular refresher training, as set out in the Col Fire Safety Policy. The on-duty FM Manager or FM Supervisor (Evacuation Coordinators) will take charge during alarm activation and direct the Fire Marshals to designated roles. Their duties will include:

- Identifying the location of an activation;
- Confirming whether there is an actual fire or whether it is a false alarm;
- Check areas are clear of all people and close all doors and windows if safe to do so;
- Direct people to the assembly point;
- Report each area is clear to the Evacuation Coordinator;
- Liaising with the emergency services;
- Prevent people from re-entering the building until safe to do so;
- In the absence of a 'buddy' or carer, assist disabled people to the safe refuges and liaise with the Evacuation Coordinator as to next steps;
- Complete inspection of fire safety equipment as directed by the FM.

2.8   The following staff have specific responsibilities as shown:

Responsibility	Member of Staff
Termly fire practices and emergency evacuation drills, combined with a programme of inducting new staff and pupils with emergency escape procedures and the presence of experienced staff who help to ensure that the School can be safely evacuated in the event of a fire	Senior Deputy Head and Facilities Manager
Keeping fire routes and exits clear	Bursar, who in turn has delegated day-to-day management to the Facilities Manager
Ensuring that flammable rubbish and combustible materials are stored away from buildings	Facilities Manager
Arranging the annual service and maintenance of fire alarms, smoke detectors, emergency lighting, fire extinguishers and other alarm systems	City Surveyor
Checking that all Science and Art and Design equipment is switched off, where appropriate, at the end of the school day	Heads of Biology, Chemistry, Physics and Art and Design (working with the relevant technicians)
Securing flammable materials used in teaching or maintenance in purpose-made, flame-proof and secure containers	Heads of Biology, Chemistry, Physics, Drama and Art and Design (working with the relevant technicians) and FM
Fixed Electrical Safety Testing	City Surveyor, who will provide the Facilities Manager with a

	copy of current electrical installation certificates
Portable appliance testing	Facilities Manager
All gas appliances and installations (boilers, kitchen equipment, etc.) are regularly inspected, maintained and serviced by Gas Safe Registered Engineers	City Surveyor and Facilities Manager
Switching off all kitchen equipment at the end of service	Catering Manager
Implementation of robust permits to work for all physical works on the fabric of the buildings and associated equipment, including hot works	Facilities Manager

3. Fire Prevention

3.1   All members of staff are to ensure that they comply with the following basic safety rules:

- Combustible materials, such as cardboard boxes and packaging materials should be disposed of safely unless they are required for other purposes. When such materials are retained, they must be kept tidily in designated storage areas.
- All corridors, stairways, entrances and exits must be kept clear. Particular attention must be paid to designated fire exits and escape routes which must be kept clear at all times and without exception.
- Classroom displays and work displayed in other areas must be set up with care and away from sources of heat. Notices must be properly fixed to boards and not allowed to flap around.
- Rubbish must be placed in metal bins or areas made of a non-combustible material. Rubbish must not be allowed to collect in 'hidden' places (e.g. behind cupboards, etc.). Particular attention should be paid to general tidiness and areas around electrical appliances.
- The stationery store and other cupboards containing stationery and other combustible materials to be kept locked and tidy.
- Boiler rooms must be kept clear, clean and locked.
- Electrical equipment must be used properly and kept in safe working order. Electrical sockets must not be overloaded and use of extension leads must be kept to a minimum.
- Clothing and costumes are often highly inflammable, they must be stored tidily and well away from any heat source.

4.0   Fire risk assessment

4.1   A requirement of the RRFSO is the completion of a Fire Risk Assessment (FRA) to determine the risk of fire occurring and identifying the precaution necessary to eliminate, reduce or manage the risk. To ensure a suitable and sufficient FRA is

produced CLSGs FM will follow the information contained in the CoL Fire Safety Policy, as well as the published documents (available on COLNET):

- Fire Safety Guidance Note FSGN79 – External FRA Companies
- Fire Safety Guidance Note FSGN77 - Ordering External Fire Risk Assessment
- Fire Safety Guidance Note FSGN56 – Fire Safety Assessment Review (Yearly Mandating)
- Col FRA Cover Page and Template

4.2 A full FRA will be completed every 5 years, in line with FSGN79, more frequently if significant changes are made to the interior of buildings, or new buildings are bought or added. This will be completed by a competent assessor approved by the CoL and the standard CoL FRA Cover page and template will be used to ensure consistency across the City's portfolio.

4.3 CoL require yearly mandating (assessment review) of all FRAs as set out in FSGN56, this is process will be managed by the FM.

4.4 The recommendations and action plan from the FRA will be managed by the FM, assisted by the FM Team and the Compliance Manager.

5.   Evacuation Plans

5.1 The Head, or another member of staff as delegated by the Head (such as the Bursar), will ensure that emergency plans are prepared to cover all foreseeable major incidents which could put at risk the occupants or users of the School. These plans will indicate the actions to be taken in the event of a major incident so that everything possible is done to:

- save life
- prevent injury
- minimise loss

5.2 All new staff (teaching and non-teaching alike) and all new pupils, are given a briefing on the school's emergency evacuation procedures on their first day at the City of London School for Girls. The Fire Evacuation Instructions (Appendix 1) are displayed on the walls of all classrooms.

5.3 All staff are to familiarise themselves with the nearest available exit route out of the building from rooms where they teach or work. Staff should also to make themselves aware of alternative routes to evacuate the building in the event that your nominated escape route cannot be used for any reason.

5.4 During an emergency those teachers who are teaching a class when the fire alarm signal sounds will assist in achieving a controlled and orderly evacuation of all pupils from the classroom to their designated assembly points.

5.5 During the external examination season, the Head of Examinations will ensure that the school complies with examination board regulations and will ensure that

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examination attendance registers are provided to the Senior Deputy Head or the person nominated to take the examinees register.

5.6 **Action required on activation of the fire alarm**

The fire alarm is a continuous 2 tone siren and on activation the Fire Marshall and FM will take charge of the situation following the duties described above. All staff, pupils and visitors should follow these instructions:

- If you discover a fire, break the glass in the nearest alarm point to set off the alarm. Leave the building by the nearest exit and make your way to the assembly point on St Giles' Terrace at the front of the school.
- If you are in a class when the fire alarm sounds, line up and then leave the room quietly. Make your way to the assembly point on St Giles' Terrace at the front of the school. The last person out should shut the door behind them.
- Anyone not in classrooms should leave the building by the nearest unimpeded exit and make his/her way to the assembly point at St Giles' Terrace at the front of the school.
- Do not stop to collect personal belongings.
- If you have a disabled pupil in your class, or a disabled visitor, staff should assist them to the designated refuge point and follow the evacuation procedures as described in the Personal Emergency Evacuation Plans or Guest Emergency Evacuation Plan.
- Anyone who is waiting to be evacuated from a designated refuge, or who is missing immediately must be report to the Premises Team or member of SMT.
- Remain at the assembly point with your pupils until the all clear is given by the Headmistress or member of the SMT.
- At the assembly area line up in forms in alphabetical order and in SILENCE. The Sixth Form will be nearest the church and the Preparatory Department nearest the lake. Line up as far away from the front of the school as possible to ensure access is available for the emergency services.
- On no account should anyone return to any building until given permission by the Fire and Emergency Services in the event of the Fire Service attending or the FM or Bursar if they do not attend.

5.7 **Specific Duties of Staff during activation**

Certain staff are to carry out the following specific duties:

Member of staff	Duty
Facilities Manager	To report to Reception and take control as the Evacuation Controller *(The Facilities Supervisor should deputise as Incident controller and liaise with the Senior Deputy to ensure everyone is accounted for and that it is safe for reoccupation)*
Receptionist	To print the Fire Register and wait at the bottom of the main entrance steps and issue to relevant staff. Make the Bursar aware of any registers that have not been collected. Assist the Bursar's PA in registering visitors, contractors, and support staff.

	(Attendance Officer to deputise in the absence of the receptionist)	
Senior Deputy Head	To register and check all teaching staff and notify the Bursar of any missing staff. *(The Deputy Head Pastoral should deputise in the absence of the Senior Deputy Head in checking all teaching staff)*	
Form Tutors and Attendance Officer	Will oversee the evacuation and control of staff and pupils and collect register for their forms from the Receptionist as soon as they reach the assembly point, register their pupils, and inform the Head of Section of any missing persons who then informs the Attendance Officer. *(The Head of Section will designate deputies in the absence of any Form Tutor in checking)*	
Music Administrator	Will receive the VMT register and check all Visiting Music Teachers who should be assembled with the teachers on St Giles' Terrace. *(The Head of Music should deputise in the absence of the Music Administrator with receiving of registers and checking VMTs)*	
Bursar's PA	Will check support staff, visitors, contractors and, via the Catering Manager, catering staff and they should be assembled at the front entrance to St Giles' Church. *(The Catering Manager will register catering staff and report to the Bursar's PA) (The Head's PA should deputise in the absence of the Bursar's PA)*	
School Nurse	The School Nurse should carry an emergency grab bag and is to assemble with the Senior Deputy Head and the other teaching staff on St Giles' Terrance. She is to stand ready to provide any medical assistance as required and co-ordinate first aiders if required.	

5.8   The safe evacuation of everyone, staff and pupils alike, is our priority. Protecting property comes second. No one should attempt to fight a fire at the expense of their own, or anyone else's safety.

5.9   **Summoning the fire brigade**
The master panel that shows the location of all the alarm call points on the networked alarm system in the school buildings is physically located in reception. The Premises Team are always given advance warning of fire practices. If the alarm goes off for any other reason, the Premises Staff have standing instructions to summon the Fire and Emergency Service at once.

5.10   One of the Premises Team is on duty or on call 24 hours a day, 7 days a week, and 365 days a year, including public holidays. When the building is unoccupied the fire alarm system is remotely monitored by a monitoring company and in the event of a fire alarm while the school is unoccupied the fire service will be called by them and then a member of the Premises Team called out to attend.

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6. Personal Emergency Evacuation Plans and Guest Emergency Evacuation Plans

6.1   Personal Emergency Evacuation Plans (PEEPs) are a pre-planning system, for staff, and others, to ensure the adequacy of the emergency arrangements for staff, pupils and other frequent users of the School's premises who may require support or assistance.

6.2   A PEEP is a process used to explore what individuals may need in an emergency evacuation to ensure they can leave the building safely and in a timely manner. The aim of the completed PEEP is to identify any assistance, aids, information or building adjustments that may be required to ensure that evacuation is as independent and safe as possible. The PEEP, once agreed with the individual concerned, may be used to inform staff or others, but only with the agreement of the individual.

6.3   PEEPs are drawn up, as required, in the School in line with the City of London Corporation's *Guidance: Personal Emergency Evacuation Plans (PEEPs)* (HSG22)

6.4   Any disabled pupil or member of staff will be subject to a Personal Emergency Evacuation Plan (PEEP), which will be drawn up in consultation with the School Nurse and form tutor or line manager.

6.5   A PEEP may also need to be drawn up where a pupil or member of staff is temporarily disabled or otherwise incapacitated (e.g. as a result of an injury or illness). It is the responsibility of form tutors to ensure the school nurse is aware that pupils require a temporary PEEP before the pupil returns to school.

6.6   A Guest Personal Emergency Evacuation Plan (GEEP) will be completed for disabled visitors in advance of their visit, where we are made aware of any impairment that puts them at a disadvantage in the event of an emergency. We also have generic GEEPs for instances where notice has not been given and these can be obtained from the Compliance Manager or Facilities Manager.

6.7   We have designated safe refuge points on every floor of every building, with signs advising of their location.

7. Visitors and contractors

7.1   All visitors and contractors are required to sign in at Reception, where they are issued with a visitor's badge, which should be worn at all times that they are on school property. They will be made aware of the emergency procedures by both the Receptionist and by the person they are visiting.

7.2   In the event of a fire alarm activation, any visitor who has not been collected will remain the responsibility of the receptionist. It is for the receptionist to direct them to the assembly point.

7.3   When large numbers of visitors are at the school for open days, plays, concerts, exhibitions etc a brief announcement is made advising them of the location of the emergency exits that they should use in the event of the alarms sounding.

8.   Training

8.1   All new employees must be informed of the fire safety provisions at CLSG. Their Line Manager is responsible for ensuring, on their first day, that they are made aware of these provisions and it is recorded on their induction document.

8.2   Staff are to be advised of the following:
- Fire action arrangements
- Location of fire exits
- Location of firefighting equipment
- Name of Fire Safety Coordinator (Facilities Manager)
- The importance of fire/smoke doors and the need to close all doors at the time of a fire and on hearing the fire alarm
- Evacuation routes
- Refuge points
- Assembly point

8.3   All employees must complete the CoL online fire safety training as part of the corporation's induction training within the first 2 weeks of starting. This fire safety module must be repeated at least every 3 years.

8.4   Fire drills form part of our fire safety training and the whole school community are expected to participate in termly drills.

8.5   Pupils are to be informed of the fire procedures at CLSG on their first day and at the start of each academic year.

8.6   Fire marshals must attend fire marshal training every 3 years, this will include the use of fire extinguishers.

8.7   The FM is also expected to attend CoL fire safety briefings which will advise them on their specific fire management plan duties.

8.8   Additional fire safety training will be reviewed dependant on departmental need i.e. fire extinguisher training, Evac chair training, fire door maintenance training.

9.   Letting and hiring of the school

9.1   Our standard contractual terms, that we use for letting and hiring the school, covers fire safety and specifies that the hirer should certify that he/she has read and understood the school's fire safety policy and procedures. A member of the Premises Team is always on duty when the school is let or hired for an outside function or event.

9.2   Regular hires to the school will undertake their own termly fire drill. A record of this will be kept by the hirer and any findings will be reported back to the Facilities Manager.

10. Prevention of Arson

10.1   The School's approach relating to the Prevention of Arson is given in Appendix 2.

Appendix 1: Fire Evacuations Notice

Action on hearing the fire alarm
- Everyone to leave the building by the nearest safe exit ensuring you do not stop to collect personal belongings;
- Where practicable, members of staff should close all doors and windows behind them;
- Members of staff are also asked to check the rooms either side of the classroom they are vacating;
- Lifts must not be used;
- You must make your way to the assembly point on St Giles' Terrace at the front of the school

Action on discovering a fire
- Move yourself out of danger;
- Break the glass of the nearest fire alarm call point;
- Attempt to put out the fire with appropriate fire extinguishers, where practicable, but do not endanger yourself;
- Whether or not you succeed, the incident must be reported to a senior member of staff without delay.

Assembly points

At the assembly area line up in forms in alphabetical order and in SILENCE. The Sixth Form will be nearest the church and the Preparatory Department nearest the lake. Line up as far away from the front of the school as possible to ensure access is available for the emergency services.

Teachers and Visiting Music Teachers (VMTs)
Should be assembled on the terrace of St Giles' Church in an orderly fashion.

Support staff, Visitors and Contractors (other than those with specific duties)
Should be assembled at the front entrance to St Giles' Church in an orderly fashion.

Appendix 2: Prevention of Arson

1.1 **Introduction**

Arson attacks on schools are serious and frequent. Twenty schools a week suffer an arson attack in the UK. A third of these happen during normal school hours. Around 90,000 children are affected by school arson each year.

Arsonists are most commonly 10–18 years of age and live in the local area. School arson is frequently carried out by either a pupil, ex-pupil or someone with siblings at the school. Many arson attacks are opportunist.

1.2 **Practical Advice on combating Arson in schools**

Schools can protect themselves against the threat of arson with a few simple techniques. Protection does not need to mean 24-hour security, expensive alarm systems or hours of risk assessment. A few simple, low-cost housekeeping techniques can help to reduce the vulnerability of a school to arson and vandalism.

This appendix on the Prevention of Arson at the School has been developed in line with the Fire Safety Advice Centre (FSAC) guidance *How to Combat Arson in Schools*, which gives some practical advice for schools as to how to make themselves less of a target. Not only will this reduce the risk of arson but will also improve security and the health and safety standards of the school. The guidance is addressed primarily at school governors, head teachers and their deputies, school premises managers and risk managers. It aims to alert those responsible for school premises to the continuing dangers of arson attacks on schools and suggests means by which such a potential can be reduced.

1.3 **Prevention of Arson During School Hours**

1.3.1 **Education**

- Staff should be made aware of the potential for daytime fires to occur (few schools have risk assessments for fire that mention daytime arson as a potential risk). Headteachers should be aware that they are responsible for the legal requirement to carry out and maintain risk assessments in case of fire. In particular, staff should be made aware of the danger of pupils being unsupervised in common rooms and corridors.
- Parents should be notified about occurrences of fires at their children's school. They should also be informed if arson is known, or suspected, to be the cause. This should be repeated whenever an incident occurs.
- Fire Safety Awareness sessions (including the risks of malicious calls) provided by the local fire service, should be held at regular intervals for all pupils.
- Regular fire drills should be undertaken as part of the Risk Assessment and records of them should be kept.
- Pupils should be told regularly that cigarette lighters and matches are not allowed in schools. Any breach should be treated as a serious disciplinary matter.

- Pupils who are suspected of involvement in starting fires should be considered for referral to Fire Service *fire setting aversion* schemes (there are different names for these schemes). Consultation with parents is essential as these schemes are often conducted at home.
- Members of staff responsible for PSHE should consider making fire issues and risks a part of everyday school life.
- All fires, no matter how small, should be reported to the Fire Brigade[1] Sometimes waste bin fires and the like are not considered worthy of reporting, or staff feel embarrassed or think of the repercussions. The Fire Brigade will understand and can assist with possible solutions to prevent further occurrences.

1.3.2 Prevention
- Architects responsible for school building projects (new and alterations to existing) should consult with Fire Service and Insurance specialists.
- Stores in and around the School that contain combustible materials should be kept locked.
- Stores that contain chemicals and hazardous materials, often adjacent to chemistry laboratories, should be well managed, clean and kept locked. The Fire Brigade should be advised of the location of such rooms for their records.
- Waste bins and wheelie bins should be located well away from the buildings, preferably in locked compounds. Waste skips used for any purpose should be located well away from buildings but not near perimeter fences or walls. Litter bins should be emptied before / at start of lunch break and at the end of each school day.

1.4 Prevention of Arson Outside of School Hours

1.4.1 Deter unauthorised entry onto the site
Ensure perimeter fencing is maintained in good order and consider the use of boundary signs to deter intruders, particularly at vulnerable spots, or areas known to be used for unauthorized access to your site.

1.4.2 Prevent unauthorized entry into the building
The easiest points of entry into school premises will be via the doors and windows. Skylights are also a weak point unless fitted with internal bars or grills. Ensure the burglar alarm system is maintained fully functional.

1.4.3 Reduce the opportunity for an intruder to start a fire
Arsonists seldom bring combustible items with them but tend to use what is available on site. External combustible storage within the school should be removed or located elsewhere.

1.4.4 Reduce the scope for potential fire damage

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[1] Small fires should be reported via the School's Health and Safety reporting procedures; the Bursar and / or Facilities Manager / Compliance Manager will notify the Fire Brigade where appropriate.

Closing all doors at night will help contain any fire or smoke within the room of origin, or at the very least, slow down the rate of fire growth.

1.4.5 **Reduce subsequent losses and disruption resulting from a fire by preparing a disaster recovery plan**

The time and effort put into creating a plan will pay dividends in the event of a serious fire, whether started accidentally or deliberately.

1.5 **Specific steps to reduce the risk of arson at the School**

- The security of the building is maintained by always having staff on duty at the main points of entry including Reception (during core opening times) and Prep Roof Gate from the Podium (during designated opening hours).
- When not in use, flammable materials are to be locked away in the correct storage containers / appropriate cupboards / locked prep rooms:
  - Science Area
  - Art department and DT
  - Drama
  - Workshops
  - Parking / Garage
- Fire Prevention is included in the PSHE programme.
- Fire inspections are undertaken regularly including vulnerable areas (such as those mentioned above)
- The Barbican Estate is closely monitored by the City of London Corporation with information provided to residents in the Good Neighbour Guide regarding management expectation within the common areas and refuse.

CITY OF LONDON SCHOOL FOR GIRLS

HEALTH & SAFETY AND WELLBEING POLICY

Policy last reviewed by:	Jane Elliott-Waine
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

Contents

1. Introduction

1.1 City of London School for Girls (CLSG) is owned by the City of London Corporation (CoL), by whom the Board of Governors is appointed. The Health and Safety at Work etc. Act 1974 places overall responsibility for Health and safety with the employer, the Corporation, therefore CLSG adheres to the overarching Corporate Health, Safety and Wellbeing Policy and associated documents.

1.2 CLSG, as a Department of the Corporation, and therefore the Head, as the Departmental Chief Officer, has a duty to produce our own Health and Safety Plans, and this document sets out our framework for the management of health and safety at CLSG.

1.3 This document should be read in conjunction with the City of London Corporation's corporate safety policy and is not intended to duplicate its contents or that of its associated procedures, guidance or protocols but provides a link between corporate requirements and the School's and demonstrates our commitment to managing health and safety. CoL health and safety documents are available on CoL Intranet (COLNET), assessable via the CLSG Staff Links on My Portal.

1.4 The purpose of this policy is to outline the organisation (people) and arrangements (systems) in place for managing health and safety at CLSG. It also includes arrangements in place for the planning, organising, control, monitoring and review of preventative and protective measures.

1.5 This policy should also be read in conjunction with:
- The Accessibility Policy and Plan
- The Educational Visits Policy
- The Fire Safety Policy and Procedures
- The First Aid Policy
- The Medical Conditions, Medicine and Infection Control Policy
- The Risk Assessment Procedure (which incorporates the City of London Corporation guidance on Risk Assessment)
- The Security, Access Control, Workplace Safety and Lone Working Policy
- Drug and Substance Abuse Policy
- Catering and Food Hygiene Policy
- The School Staff Development and Induction Policy
- The City of London Corporation's Occupational Health and Wellbeing Policy
- The City of London Corporation's Policy on Physical and Verbal abuse of City of London Corporation employees
- The City of London Corporation's Staff Code of Conduct

All other relevant City of London Corporation policies[1].

1.6 This policy consists of three parts:

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[1] Available with a City of London Corporation employees' login.

- the general statement of policy
- the description of responsibilities for and the organisation of health and safety
- the detailed arrangements for health and safety

1.7 This policy has regard to Part 3 (Welfare, health and safety of pupils), Paragraphs 11 (Health and Safety) and 16 (Risk Assessment) and Part 5 (Premises of and accommodation at schools), Paragraphs 23–29 of the Independent School Standards Regulations.

2. General statement of policy

2.1 On behalf of the City of London Corporation (as the employer), the Governors attach the highest priority to ensuring that all the operations within the school environment, both educational and support, are delivered in a manner that is safe and healthy for all.

The Governors and the Head are committed to promoting the welfare of all in the School community so that effective learning can take place, and we recognise that under the _Health and Safety at Work Act_ (1974) we have a collective responsibility for providing a safe and healthy school for all of the School's staff, pupils, parents / carers, visitors, contractors and anyone else affected by the School's activities or who use the premises of the School from time to time. We will actively promote best practice from regulatory bodies, as this is fundamental to the success of the School and its pupils.

Our aim is to provide and maintain safe and health working conditions, facilities, equipment, and systems of work for all our employees. We believe that through information, training, resources, collective sharing of good practice, having open and honest communication and clear supervision, we will be able to foster a positive safety culture at CLSG.

The allocations of duties and responsibilities for safety matters and the particular arrangements which we make to implement this policy are set out below. To ensure that people understand what they need to do to stay safe this document and all other health, safety and wellbeing documents will be presented in a clear and uncomplicated way.

We will ensure that the policy and arrangements are kept up to date, particularly as new risks are identified or emerge and where there are changes within the school in terms of its nature or size.
Signed:

The Head:

Date:

2.2 The Governors, the Head and Staff recognises there is specific legislation and guidance from the Health and Safety Executive and other Government departments that need to be

referred to and complied with to enable us all to maintain a safe environment in which to work and learn.

2.3   We recognise the guidance contained in the Health and Safety Executive (HSE)'s _Managing for Health and Safety_ (HSG 65) and _Sensible Health and Safety Management in Schools_ and intend to follow the good practice recommendations they make. The School is aware of, and will follow, the DfE's guidance _Health and safety: responsibilities and duties for schools_.

2.4   The School recognise the good practice contained in the HSE's guidance _School Trips and Outdoor Learning Activities: Tackling the Health and Safety Myths_ and the DfE's _Health and Safety on Educational Visits_ (2018), and this is incorporated in the School's Educational Visits Policy.

2.5   The School will create and maintain written risk assessments of the risks to the health and safety of its employees whilst they are at work and others who may be affected, as required by the _Management of Health and Safety at Work Regulations_ (1999) (see the Risk Assessment section).

2.6   The School is conscious of the external environment that may be affected by its activities and pays regard to the implications of the _Environmental Protection Act_ (1990) (in particular, the duty of care as regards waste).

2.7   The Governors accept these responsibilities and it will continue to be their policy to promote standards of health, safety and welfare that comply fully with the terms and requirements of the above Act, Regulations made under that Act, and Approved Codes of Practice. It is considered by the Governors that health and safety is a responsibility at least equal in importance to that of any other function of the School, and they believe that the prevention of accidents, injury or loss is essential to the efficient operation of the School and is part of the good education of its pupils.

3.   Responsibilities

3.1   **The responsibilities of the Board of Governors (on behalf of the City of London Corporation[2])**
In the discharge of its duty the Board of Governors will:

- Provide strategic governance by demonstrating leaderships and commitment to improving health, safety and wellbeing performance at CLSG;
- Ensure that they and the whole CLSG community adhere to the provisions laid out in the overarching CoL Health, Safety and Wellbeing Policy and associated documents;

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[2] The City of London Corporation provides the necessary legal, technical and practical health and safety assistance and information to help the School undertake the measures needed to comply with health and safety law, and provides an independent monitoring service of the activities of the School.

- Ensure that there is an effective and enforceable policy for the provision of health and safety throughout the School and that it contains rigorous and comprehensive systems for monitoring and auditing health and safety management within the School;
- Ensure that CLSG's health and safety policies and procedures are kept up to date and that positive arrangements are in place to ensure that all staff and pupils are aware of and comply with their contents;
- Accept their role, collectively and individually, in providing health and safety leadership within the School, and will ensure and require that they are kept informed of, and alert to, relevant health and safety risk management issues;
- Fulfil their responsibility by appointing a nominated as Governor with responsibility for overseeing Health and Safety (see the *Responsibilities* section below, and Appendix 1);
- Receive reports relating to health and safety in order to enable them to monitor the adequacy of arrangements and take any action necessary.

3.2 **Nominated Health and Safety Governor**

The Governors will appoint one of their number to be the nominated governor, who has responsibility for oversight of Health and Safety matters, but clearly acknowledge that this role does not detract from the health and safety responsibilities of the other Governors, either individually or as a whole. The nominated Governor will ensure that the Head is actively taking responsibility for ensuring that corporate and departmental policies are being effectively implemented within the school.

3.3 **The responsibilities of the Head**

The Head is directly responsible to the Governors on a day-to-day basis for the safe functioning of all the School's activities. They are also responsible for ensuring the implementation of Corporate and School policies. In particular, the Head is required to:

Leadership, management and oversight
- Be aware of the basic requirements of the *Health and Safety at Work Act* (1974) and any other Health and Safety legislation and codes of practices relevant to the School.
- Take all necessary and appropriate action to ensure that the requirements of all relevant legislation, codes of practice and guidelines are always met in full.
- Implement the requirements of this policy and ensure compliance with all health and safety legislation within the School.
- Ensure that the objectives outlined within this policy are fully understood, observed and implemented by persons under their control.
- Demonstrate a personal commitment to health and safety by providing visible and active leadership and leading by example.
- Ensure a positive health and safety culture is evident and a proactive approach to health and safety management is adopted within the School.
- Ensure, at all times, the health, safety and welfare of staff, pupils and others using the School premises or facilities or services or attending or taking part in School-sponsored activities.

- Oversee the maintenance and development of safe working practices and conditions for teaching staff, support staff, visiting and casual staff, pupils, visitors and any other person using the premises or engaged in School-sponsored activities. The Head will take all reasonably practicable steps to achieve this end, through the Bursar, Heads of Departments (where appropriate) and other senior members of staff, Teachers, and others as appropriate, to ensure the co-operation of all staff at all levels with regard to working to this policy.
- Monitor the standards of health and safety throughout the School, including all School-based activities, encourage staff, pupils and others to achieve the highest possible standards, and discipline those who consistently fail to consider their own well-being or the health and safety of others.
- Be responsible for ensuring that all staff fully understand their responsibilities and are given both the time and the encouragement to pursue them.
- Appoint a competent person, the Compliance Manager, to assist them with meeting the health safety objectives, standards and checks detailed in this policy.
- Consult with all appropriate members of staff, including staff representatives, on health and safety issues.
- Constantly monitor the effectiveness of this policy as regards both teaching and non-teaching work, and report back and recommend (to the Bursar and /or Compliance Manager, as appropriate) changes to the policy in the light of experience.
- Take steps to ensure that changes in curriculum are considered for their health and safety implications.

Facilities and environment
- Ensure the School requirements with respect to Fire Matters are implemented in line with legislation and CoL policy.

Investment in and provision of resources
- Ensure all school decisions (including new projects, procurement decisions, contractor selection, etc.) fully consider health and safety.
- Ensure that, so far as it is within their control, that adequate funds, materials, equipment and human resources are provided to ensure health and safety requirements are being met.

Risk management
- Be responsible for ensuring that suitable risk assessments are completed covering all processes and activities carried out, with adequate records being maintained and available for inspection.
- Ensure safe working practices and procedures throughout the School, including those relating to the provision and use of machinery and other apparatus, so that each task is carried out to the required standards and so that all risks are controlled.
- Ensure that adequate communication and consultation channels are maintained so that information concerning health and safety matters, including the results of risk assessments which may affect staff, is adequately communicated to them.

- Encourage all employees to suggest ways and means of reducing risks.
- Monitor performance with regard to health and safety by the completion of the CoL Corporation's Annual Certificate of Assurance.
- Ensuring that CLSG manages its risk profile through the recording of the most significant ('Top X') risks on the CoL Risk Register, and that this is kept under constant review and appropriately updated.

Training
- Ensure suitable persons are nominated to undertake key health and safety functions within the School and to ensure these individuals are adequately supported and suitably trained.
- Ensure that all persons under the Head's control are adequately trained to carry out any task required of them in a healthy and safe manner.

3.4 **The responsibilities of the Bursar and Senior Deputy Head**
The Head works with the Board of Governors to ensure compliance with this policy. The Bursar is the member of the Senior Management Team (SMT) to whom the Head delegates day-to-day operational responsibility for health and safety in the School. The Bursar has overall responsibility for monitoring health and safety within the School and for reporting any serious breaches to the Governors through the Head. The Bursar works closely with the Senior Deputy Head and Compliance Manager in fulfilling this role, and is responsible to the Board of Governors (through the Head) for:

Organisation and management
- Monitoring the management structure, along with the Head and nominated Governor.
- Chairing the School's Health & Safety Committee.
- Encouraging staff, pupils and others to promote Health and Safety.
- Ensuring compliance with the City of London Corporation's Corporate Health and Safety Policy including the requirement for monitoring, safety assurance and inspections.

Reporting and monitoring
- Providing copies of all relevant paperwork to the governor overseeing health and safety.
- Producing reports for Governors on health and safety covering:
  o statistics on accidents to pupils, staff and visitors
  o staff training
  o fire practices
  o all new or revised related policies and procedures.
- Providing the minutes of the Health and Safety Committee's meetings, together with any other issues on health and safety that the Bursar as Chair of the Health and Safety Committee considers need to be brought to the Governors' attention, at each meeting of the Board of Governors.
- With the Facilities Manager, ensuring that the School's adherence to health and safety in catering and cleaning of the food preparation and eating areas is subject

to external inspection by the Environmental Health Officer. [In addition, the Catering Manager arranges for a regular independent hygiene and safety audit of food storage, meal preparation and food serving areas, together with regular external deep cleaning and pest control services, and the Bursar reports on all these aspects to the Health and Safety Committee.]

- Providing for monitoring by the Health and Safety Committee of safety assurance / inspection reports and actions required / timescales.
- Maintaining the School's Risk Register via Pentana, the CoL Risk Management Information System, and ensuring that the top risks are regularly reviewed by SMT and the Board of Governors to ensure that they accurately reflect the top risk and actions to mitigate the risk.

Risk Assessment
- Arranging systems of risk assessment which allow both the identification of educational opportunities and the prompt identification of potential hazards.
- Ensuring that robust arrangements, including adequate monitoring, are in place for the control of contractors working anywhere on the school site / premises.
- With the Facilities Manager, ensuring that a suitable and sufficient risk assessment for legionella / water hygiene management is periodically completed (frequency based on risk assessment) and that a suitable scheme of control is developed, implemented and monitored, including monthly water temperature testing regimes.

First Aid
- With the School Nurse, monitoring first aid and welfare provision.
- Ensuring that an adequate number of staff (teaching and support) is trained and qualified in first aid.

Fire Safety
- Ensuring that the School has a fire risk assessment, carried out by a suitably competent external risk assessment consultant, and that this is updated every five years (or more frequently if significant changes are made to the interior of buildings or on significant change of usage). The Health and Safety Committee should review this risk assessment every time it is amended.
- Supervising the Facilities Manager in the role of Fire Safety Manager.

Induction and Training
- Ensuring that the school has a comprehensive policy in place for the training and induction of new staff in health and safety related issues, which should include basic manual handling and working at height training where required. Health and Safety training that is related to an individual member of staff's functions, such as a science technician, will be provided in addition to the "standard" induction training.
- Identifying the training needs of staff and pupils in Health and Safety matters and ensuring, within the financial resources available, that all members of staff and

pupils who have identified training needs receive adequate and appropriate training.

3.5 **The responsibilities of Compliance Manager**

The Compliance Manager is the competent person with regard to health and safety at CLSG. They are responsible for ensuring there is a coherent and adequate health and safety management system in place. They provide general advisory and information services for CLSG on matters of health, safety, wellbeing and fire and activity assists the Bursar and Senior Deputy Head with their day-to-day operational duties. They work in partnership with the Facilities Manager on matters relating with health, safety and fire and are responsible for:

- Reviewing health and safety policies and ensuring that our documents reflect our risk profile and are compliant with relevant legislation and industry best practice;
- Working with the Facilities Manager, carrying out site inspections, internal safety audits and overseeing external audits including those completed by the CoL;
- Carrying out periodic reviews and safety audits on the findings of risk assessments;
- Collating accident and incident information and, where necessary, carrying out accident and incident investigations and to complete reports, when required, to the CoL Health and Safety Team in line with their procedures, including RIDDOR reportable incidents;
- Work in collaboration with the School's Facilities Manager, ensure compliance with all fire regulations, CoL fire policies and procedures and ensure that regular fire risk assessments are undertaken and action plan implemented;
- Monitor the safety management system and advise relevant managers in reviewing departmental safety procedures;

3.6 **The responsibilities of Supervisory Staff**

All supervisory staff (e.g. the Senior Management Team, Heads of Departments (HoDs), Science Technician and D of E Coodinator) are responsible for the effective control of risks within the specific areas under their control. They will also be responsible for identifying potential hazards within their departments and writing appropriate risk assessments.

As part of their day-to-day responsibilities they will ensure that:

- Safe methods of working exist and are implemented throughout their department.
- Health and Safety regulations, rules, procedures and codes of practice are being applied effectively.
- Staff, pupils and others under their jurisdiction are instructed in safe working practices.
- New staff within their department are given instruction in safe working practices.
- They monitor the standard of health and safety throughout the department in which they work, encourage staff, pupils and others to achieve the highest possible standards of Health and Safety and discipline those who consistently fail to consider their own well-being or the Health and Safety of others.
- Regular safety inspections are made of their area of responsibility.

- Positive, corrective action is taken where necessary to ensure the health and safety of all staff, pupils and others.
- All plant, machinery and equipment in the department in which they work is in good and safe working order and is adequately guarded where required, and all reasonably practicable steps are taken to prevent its unauthorised or improper use.
- Appropriate protective clothing and equipment, first aid and fire appliances are provided and readily available in the department in which they work.
- Toxic, hazardous and highly flammable substances in the department in which they work are correctly used, stored and labelled.
- All the signs used meet the statutory requirements.
- All Health and Safety information is communicated to the relevant persons.
- They report, as appropriate, any Health and Safety concerns to the Bursar, Compliance Manager and Senior Deputy Head.

3.7 **The responsibilities of all members of staff**

All members of staff are responsible for taking reasonable care of their own health and safety, and that of pupils, visitors, temporary staff, volunteers, contractors and any other persons who may be affected by their acts or omissions at work as regards any duty or requirements imposed on the School or any other persons by or under any of the relevant statutory provisions. They are responsible for cooperating so far as necessary with the Head, other members of the Senior Management Team and Compliance Manager in order to enable the Governors to comply with health and safety duties and requirements.

In particular, all members of staff will:
- Be familiar with, and comply with, this policy and all other safety policies and procedures as approved by the Board of Governors.
- Acquaint themselves with any specific health and safety legislation applicable to their role.
- Ensure health and safety regulations, rules, routines and procedures are being applied effectively by both staff and pupils.
- See that all plant, machinery and equipment is in good and safe working order and adequately guarded (where required) and prevent its unauthorised or improper use.
- Use the correct equipment and tools for the job and any protective equipment or safety devices which may be supplied.
- Ensure that toxic, hazardous and highly flammable substances are correctly used, stored and labelled.
- Report any risks or defects in the premises, plant, equipment and facilities which they observe to the Bursar, Compliance Manager and / or the Facilities Manager.
- Take an active interest in promoting health and safety and suggest ways of reducing risks.

Employees should not be in any doubt that CLSG will apply disciplinary procedures to an employee who is in breach of the Schools' and CoL Corporations policies and procedures.

All staff are briefed on the availability of this policy on the Staff intranet and the School's website. Staff will be advised as and when it is reviewed, added to or modified. Details of the organisation and arrangements for carrying out the policy are to be found below.

3.8 The responsibilities of Pupils

Pupils will be reminded by staff that they are expected to;

- Exercise personal responsibility for the health and safety of themselves and others;
- Observes all health and safety rules of the school and, in particular, the instruction of staff given in an emergency;
- Use and not wilfully, neglect or interfere with things provided for their health and safety.

3.9 The responsibilities of Hirers, Contractors and Others

When the premises are used for purposes not under the direction of the Head, then the principal person in charge of the activities for which the premises are in use will have responsibility for safe practices.

The Head, the Bursar or Senior Deputy Head will seek to ensure that hirers, contractors and others who use the School premises conduct themselves and carry out their operations in such a manner that all statutory and advisory safety requirements are met at all times.

When the School premises or facilities are being used out of normal School hours for a school-sponsored activity then, for the purposes of this policy, the organiser of that activity, even if a member of staff, will be treated as a hirer and will comply with the requirements of this section.

When the premises are hired to persons outside the employ of the School, it will be a condition for all hirers, contractors and others using the School premises or facilities that they are familiar with this policy, and aspects of any other relevant health and safety policies and procedures, that they comply with all safety directives of the School, report any accidents or near misses which occur on the premises and that they will not without the prior consent of the School:

- introduce equipment for use on the School premises
- alter fixed installations
- remove fire and safety notices or equipment
- take any action that may create hazards for persons using the premises or the staff or pupils of the School

All contractors who work on the School premises are required to ensure safe working practices by their own employees.

In instances where the contractor creates hazardous conditions and refuses to eliminate them or to take action to make them safe, the Head will take such actions as are necessary to protect persons in the care of the Head from risk or injury.

4. Arrangements to Establish, Monitor and Review Procedures

4.1 Our arrangements set out the process by which we can demonstrate our commitment to eliminate or reduce the risks of hazards in the workplace and facilitate the creation of a healthy and safe working environment throughout the School.

As a 'Department' of the CoL we adhere to the policies and procedures published on the CitySafe section of COLNET as well as our own health safety documents published on the School Portal. The health and safety policies, procedures, maintenance records, documents and signage represent an integral part of the School's Safety Management System. The individual policies and procedures provide guidance on the processes to follow to demonstrate a consistent approach to health and safety across the School and must be adhered to. They contain the forms and templates required to control and manage hazards identified.

4.2 **The Health and Safety Committee**
The Health and Safety Committee provides a platform to ensure the dissemination of health and safety information as well as to deliver an appropriate forum for two-way communication.

The Health and Safety Committee is chaired by the Bursar and meets termly. The Governor who is responsible for health and safety attends these meetings, whenever possible. Membership of the Health and Safety Committee is as shown in Appendix 1, which also gives the identities of key post-holders in the School. CoL Building Surveyor and Health, Safety and Wellbeing Manager are Co-opted members.

The aims of the committee are to monitor the effectiveness and implementations of this Health and Safety Policy and the safety management systems. This will include review of accidents, changes to legislation and guidance, updates to policies and procedures, discuss inspection and audit actions plans, review risk assessments, discuss training needs, assist in the development of safety rules and ways to increase reporting by all members of staff and pupils.

4.3 **Health & Safety Coordinator**
The Compliance Manager is the School's Health and Safety Coordinator, supported by the Facilities Manager. In this capacity, they are responsible, with the Bursar, for the submission of the City of London Corporation's Annual Certificate of Assurance (ACA) and termly safety assurance inspections, the results of which are reported to the Health and Safety Committee.
The Health and Safety Coordinator is assisted in these inspections by the Senior Deputy Head, the Bursar, Facilities Manager and the Governors' representative.

4.4 **External Advisors for Health and Safety**

The City of London Corporation Surveyor's Department, Fire Safety Team, Health and Safety Team and, where necessary, external consultants provide advice on matters of health and safety as required:

General
- All gym and fitness equipment and machinery used in design technology is serviced annually as arranged by the Facilities Manager.
- CLEAPSS for Science, Art and D&T safety.

Facilities
- The City Surveyor gives advice on the external fabric of the school and compliance with the Construction (Design and Management) Regs 2015 (CDM).
- The City Surveyor monitors and services the School's plant, equipment and lifts as required.
- All work on gas boilers, appliances and installations is carried out by suitably competent Gas Safe registered engineers.
- All lightning protection and earthing are tested annually by a specialist contractor.
- NICEIC qualified Electrical Engineers inspect and maintain electrical installations, all of which are RCB protected and meet the requirements of IEE wiring regulations; current electrical test certificates are held for all areas of the School.

Catering and Cleaning
- Adherence to health and safety in catering and cleaning is subject to external inspection by the Environmental Health Officer.
- In addition, the School's catering contractor arranges for:
  - An external professional to take swabs of all knives, chopping boards and other kitchen equipment three or four times a year, and report on those findings.
  - An independent hygiene and safety audit of food storage, meal preparation and food serving areas three times a year.
  - Professional advice from a dietician on healthier food, menu planning and special diets where necessary
  - The professional deep cleaning of all equipment, high level cleaning of all cooking, food preparation and storage surfaces, areas, etc. once a year.
  - Appropriate pest control measures to be in place.

Fire
- The School has a professional fire risk assessment which is updated at least every 5 years[3]; this is coordinated by the Facilities Manager.

Water
- The City Surveyor arranges for a professional risk assessment for water / legionella; this is coordinated by the Facilities Manager.

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[3] The last Fire Risk Assessment was completed in November 2019.

Radiation
- The Radiation Protection Supervisor (RPS) is as stated in Appendix 1. The RPS is responsible for ensuring compliance with the Ionising Radiation Regulations 2017 including the requirement for appointing a suitable Radiation Protection Adviser (RPA) to provide competent advice.
- The Radiation Protection Advisor (RPA) is as stated in Appendix 1.

City of London Corporation Advisors
- Other advisors may be provided or appointed by the City of London Corporation as required.

5. Recording and Reporting Accidents

5.1 The School is obliged under the City of London Corporation's guidelines to record and report accidents of a certain nature. There is also a legal duty to report certain accidents and dangerous occurrences to the Health and Safety Executive (HSE) under the *Reporting of Injuries, Diseases and Dangerous Occurrences Regulations* (RIDDOR) (2013). Recording and reporting accidents enables the HSE and local authorities to identify where and how risks arise, and to investigate serious accidents.

All accidents occurring on site and on offsite trips and visits are to be recorded on the Health Safety form on the intranet. The Compliance Manager will be responsible for investigating all reports and judging the level of response required, including submitting reports the CoL who will report to RIDDOR on our behalf.

Further advice and guidance on the reporting of incidents can be found in the CLSG First Aid Policy.

6. Risk Assessment

6.1 The School's approach to Risk Assessment is outlined in the School's Risk Assessment Guidance, which should be read in conjunction with this policy.

7. Staff Welfare

7.1 **Occupational Health Service**
The Occupational Health Service is responsible for promoting health and wellbeing matters in the workplace. The service plays an integral part in the School's progressive and proactive role as an employer to safeguard the physical health and mental wellbeing of employees. The School provides access to the City of London Corporation's Occupational Health Service, as outlined in the City of London Corporation's Corporate

Health, Safety and Wellbeing Policy and the City of London Corporation's Occupational Health and Welfare Policy. Further information is available from the Bursar, Senior Deputy Head and / or HR.

7.2 **Violence to staff**

Incidences of violence to staff will be handled in line with the City of London Corporation's Policy on Physical and Verbal abuse of City of London Corporation employees. In the event of such an incidence, staff should inform the Senior Deputy Head and / or the HR Manager; where required, reasonable recovery time would be provided and a referral would be made to the Occupational Health Service.

Incidences of violence to staff by pupils would also be handled in line with the pupil's Behaviour Policy.

7.3 **Wellbeing Committee**

CLSG are committed to improving the wellbeing of staff and pupils and have introduced a Wellbeing Committee to assist in this aim. The committee actively reviews and shares good practice, looks ahead to pre-emptive stressful situations and looks to ways to best promote wellbeing provisions offered by CoL Corporation and CLSG.

8. Competency and Training

8.1 Safety training is needed at all levels. It is an important way of achieving competence and helps to convert information into safe working practices. Each department's risk assessments should help to determine the level of training needed for each type of work as part of the preventive and protective measures. The training should include basic skills training, specific "on-the-job" training and training in health and safety or emergency procedures. A training needs analysis (TNA) must be carried out for each post, posts can be grouped under a general TNA, however, line managers must identify any particular need that an individual member of staff may have as a result of their duties or personal circumstances

8.2 General health and safety induction is provided by Line Managers and all staff are provided with a login to City Learning where they must complete the mandatory e-learning health and safety and fire modules.

8.3 Further health and safety training, as offered, can be booked via City People Self Service. Specific job-related training e.g. use of machinery is to be arranged by Managers using competent colleagues or external providers and risk assessment training is organised by the Compliance Manager. Managers should review any training needs as part of the risk assessment process and during staff appraisals. Managers should refer to the Health, Safety and Wellbeing Training Matrix which can be found on the COLNET, CitySafe.

8.4 Our policies and procedures form part of our training system and staff are responsible for making themselves aware of the content of all relevant documents applicable to their role.

8.5 So far as is reasonably practicable, the School will:
- Make arrangements for all staff (including temporary staff and those on fixed-term contracts) and volunteers, where necessary, to receive comprehensive information about this policy and all other relevant Health and Safety matters.
- Ensure that this policy is used as a practical working document and that its contents are publicised fully.
- Ensure that any changes in this policy will be brought to the attention of all employees.
- Provide all staff and pupils with the information, instruction, training and supervision that they require to work safely and efficiently and carry out their duties in a safe manner without placing themselves or others as risk. Relevant information will be disseminated to staff as appropriate.
- Ensure that they are kept informed about any significant health and safety failures and the outcome of the investigations into their causes.

8.6 Members of staff have responsibility for organising training and maintaining records of training as given in Appendix 1.

9. Measuring Performance

9.1 Effective monitoring, inspection and audit are required to ensure that health and safety policies, arrangements, regulations and standards are in place and remain effective.

Active measuring techniques employed by the school are to include:
- Routine audits of documentation and procedures by the Compliance Manager and reports submitted to the Health and Safety Committee, and Board of Governor meetings, as appropriate;
- External examination of records and policies by external audit to check that systems relating to the promotion of the environment and safety culture are complied with;
- The systematic inspection of premises, plant and equipment by maintenance staff, managers, safety representatives and auditing consultants;
- Regular inspections of by the Senior Deputy Head, Compliance Manager, Operations Manager and other staff as appropriate.

Reactive measurement is triggered after an accident, incident or illness and provides an opportunity for the School to check performance, to learn from mistakes and to improve the working environment, safety management and risk control.
Reactive measurement techniques to be employed include:
- Accident, incident and near miss reporting;

- Ill health data where related to occupational causes;
- Reporting the outcomes of accident and incident investigations;
- Details of enforcement action from external regulators, including improvement and prohibition notices and, where relevant, prosecution.

9.2   Each year the School completes and submits the CoL Annual Certificate of Assurance (ACA) which provides us with an opportunity to examine our Health and Safety systems and determine how effective they are. This is a useful tool to identify strengths and weaknesses in the application of health and safety policy and outcomes of the ACA direct action for the year ahead to ensure robustness of the health and safety systems is maintained.

10.   Review of policy

10.1   This policy will be reviewed (at least) annually and updated, modified or amended as necessary to ensure the health, safety and welfare of staff and pupils.

10.2   From time to time the Department for Education (DfE), the Health and Safety Executive (HSE) and other regulatory or advisory bodies will issue codes of practice on particular topics for the guidance of Heads and others who are in control of educational premises, who will normally incorporate such codes into their Health and Safety policy and procedures. If the Head considers the inclusion of all or any such documents into this policy to be inappropriate, the Head will be required to demonstrate to the satisfaction of the Governors that codes of practice and methods of working which achieve a similar or higher standard of health and safety have already been introduced.

Appendix 1: Identities of key personnel

1.1 The table below gives the identities and contact information of key School personnel:

Nominated Governor	Peter Bennett
Bursar	Katie Kerr
Senior Deputy Head	Justine Venditti
Facilities Manager (also Fire Manager)	Mark Smith
Compliance Manager (Health and Safety Coordinator)	Jane Elliott-Waine
Radiation Protection Supervisor (RPS)	Mark Wilkinson (Head of Physics)

1.2 The table below gives the identities and contact information of key external support:

City of London Corporation H&S Advisor	Justin Tyas
City of London Corporation's competent person for advice on Fire Safety	Terence Short
City of London Corporation's competent person for advice on water hygiene / asbestos	David Renshaw
The Radiation Protection Advisor (RPA)	External consultant from CLEAPSS

1.3 The table below shows the composition of the Health and Safety committee:

Role in School	Role on Committee
Bursar	*Chairman*
Senior Deputy Head	
Facilities Manager	*Updates on building compliance*
Deputy Head Partnership and co-curricular	*Educational Visits Coordinator*
Compliance Manager	*Responsible for Accident reporting*
Director of ICT	
Head of Prep Dept	
Head of Biology	
Head of PE	
Head of DT or DT Technician	
Head of Art or Art Technician	
Director of Music or Music Administrator	
Head of Drama or Drama Technician	
SEND Coordinator	
School Nurse	*Responsible for first aiders*
Staffroom Chairperson or Representative	

In addition, the nominated Health and Safety Governor may attend committee meetings.

1.5 **The role of the Facilities Manager with regard to Health and Safety**

- Ensuring that the external fabric of the school, its plant, equipment and systems of work are surveyed and inspected regularly by competent professionals and that their recommendations and cyclical planning form the basis of the School's routine maintenance programmes.
- Ensuring that any defects in the premises, its plant, equipment or facilities which relate to or may affect the Health and Safety of staff, pupils and others are made safe without delay.
- Ensuring that suitable arrangements are in place for the day to day management of any asbestos containing materials (ACMs) so as to prevent them from being disturbed, forming part of our duty to manage asbestos.
- With the City Surveyor, ensuring compliance with Construction (Design and Management) (CDM) Regulations 2015.

1.6 The following members of staff have immediate and major delegated responsibilities for Health and Safety in the areas indicated below:

General

General Hazards	Compliance Manager and Facilities Manager
Machinery & Electrical Equipment	Facilities Manager, Head of DT, Head of Drama, Head of Science, IT Manager, Media Resources Technicians
Substances Hazardous to Health	Heads of Science subjects, Science Technicians, Head of Art, Head of DT, Art & Design Technicians, Facilities Manager, Cleaning Contractor
Kitchen	Catering Manager, Facilities Manager
Manual Handling	Facilities Manager
Display Screen Equipment	IT Manager and Media Resources Technicians
First Aid and Injury Reporting	School Nurse, Compliance Manager
Escorting pupils or arranging for pupils to be escorted to hospital and informing their parents of the circumstances	School Nurse
Checking that all first aid boxes and eye washes are kept replenished	School Nurse
Radioactive Substances	Head of Physics and Physics Technicians
Controlling contractor activity	Facilities Manager, Surveyors Department
Common Room Issues	Common Room Representative
Working heights over 2m	Facilities Manager, Drama Technician
Legionella Hazards	Facilities Manager
Statutory Notices	Bursar, Facilities Manager

Playground Safety	Senior Deputy Head, Head of Prep School and Head of PE
Cleaning	Facilities Manager, Contractors, and Science Technicians (in laboratories)
Disposal of Hazardous Waste	Facilities Manager, Head of Science, Science DT and Art Technicians
Swimming Pool and Plant	Facilities Manager
Duke of Edinburgh Awards	Duke of Edinburgh Coordinator
Monitoring and Review	Bursar, Compliance Manager, Health and Safety Committee, Board of Governors
Induction Training Procedures	Senior Deputy Head, Bursar, Compliance Manager and HR
Slips, trips and falls	Bursar and Facilities Manager (see Appendix 4)

Safety and Security

Building security (including alarms, CCTV, locking external doors and windows)	Bursar, who in turn has delegated day to day management to the Facilities Manager.
Preventing unsupervised access by students to potentially dangerous areas, such as the swimming pool, the science laboratories and the design technology rooms	Bursar, Senior Deputy Head and Heads of Department, working in cooperation with the Facilities Manager
Controlling lone working after hours	Senior Deputy Head and Facilities Manager
Ensuring that all visitors book in at Reception and wear visitors' badges	Bursar, Facilities Manager
Permits to Work implemented, where necessary, for physical works to the fabric of the buildings or on plant and equipment by contractors	Facilities Manager

Trips and visits

School Outings	Organisers of school trips to follow School Policy, with Deputy Head Partnerships and Co-curricular as Educational Visits Coordinator

Vehicles & Transport

Control of loading bay and Andrews House care parking	Facilities Manager
Compliance with City of London Corporation Transport Policy	Bursar, Facilities Manager and Compliance Manager

Water, Drainage, etc.

The City Surveyor, together with the Facilities Manager, is responsible for:

Maintaining water quality.	A sampling regime, using external contractors, is in place
Ensuring that drains, gutters etc are kept unblocked.	Checking that all drain runs are clear using external contractors where necessary

Fire

Fire	Bursar, Facilities Manager, Head of Science, Catering Manager, Director of Drama.

1.7   The following members of staff have responsibility for organising training and maintaining records of training in the areas given below:

Member of staff	Area of responsibility
Science-related health and safety training	Head of Sciences
Design Technology related training	Head of DT
Health and safety training for catering and cleaning staff	Catering and Cleaning contractors
Briefing new pupils on emergency fire procedures	Pastoral Staff
Briefing new staff on emergency fire procedures	Line Managers in the new staff induction process
Inducting new staff in health and safety	Line Managers in the new staff induction process
Identifying specific health and safety training needs of staff	Heads of Department and Line Managers or Supervisors
First aid training	School Nurse
Health and Safety training for senior staff such as HODs	Bursar
DSE training and assessment	Media Resources Technician
All visits and trips	Educational Visits Coordinator

Appendix 2: The organisation for Health and Safety

Board of Governors
Overall responsibility for health and safety

Nominated Governor
Responsibility for oversight of health and safety

Head
Ultimate responsibility for health and safety within the School

Bursar
Responsibility for day to day operations, organisation of health and safety, and adherence to regulatory requirements

City Surveyor and other City of London Corporation and external professional advisors
Corporate oversight and guidance

Compliance Manager
Competent person and reporting of incidents / near misses

Members of the Health and Safety committee
Communication with and feedback from / to the whole School community

Whole School Community
Governors, Staff, Pupils, Visitors, Volunteers, and Contractors working on site

Appendix 3: Accident Reporting Flow Chart

The flow chart below is used to determine whether an accident / incident occurring in School should be reported to the City of London Corporation.

Appendix 3: Accident to Pupil / Young Person Reporting Flow Chart

Start

Accident/incident has occurred to a pupil/ young person

Was either **supervision; environment; equipment or substance;** a possible factor in the accident that occurred?

Yes

No

Did the accident occur during a **supervised lesson/teaching event?**

No → Record accident in local incident book

Yes → Immediately contact CoI Accident / Incident ReportLine: 020 7332 1920

Was the pupil/young person taken **directly to hospital** or did they die as a result of the accident?

No → End

Yes → **HSE reportable** *ReportLine will submit the report to HSE in consultation with the school and Corporate Safety*

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Appendix 4: Guidance[4] regarding Slips, Trips and Falls

5.1 Causes of slips and trips

Slip and trip accidents happen for a number of reasons. The following slip potential model helps us to understand the factors that can contribute to slip accidents and the actions to take to prevent them:

- Contamination
- Cleaning
- People
- Flooring
- Environment
- Footwear

One or more of these factors may play a part in any slip accident.

5.2 Preventing trips

The majority of trips are caused by obstructions in walkways. The rest are caused by uneven surfaces. Preventing these accidents is often simple and cost-effective. We need to get all three right (walkways, housekeeping and design and maintenance), to prevent tripping accidents.
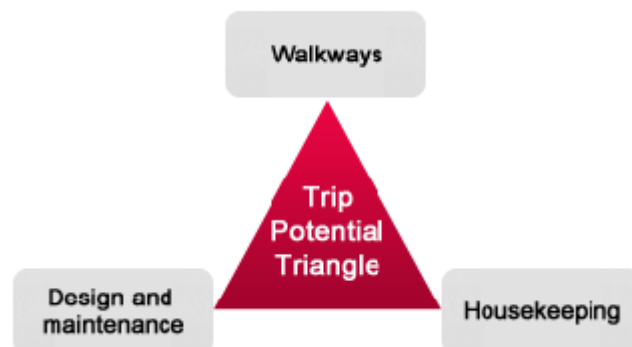
5.2.1 Walkways

Check for suitable walkways: are they in the right place, are they being used, and are they available for use? What tasks are taking place on the walkway (e.g. is the task preventing employees from seeing where they going)?

5.2.2 Housekeeping

It is not just good enough to have a walkway, it must be kept clear, no trailing wires, no obstructions. Employees and cleaners need to have 'a see it, sort it' attitude to ensure these and other work areas are kept clear:

- Is the cleaning regime effective?
- Are there enough bins, storage facilities, etc?

5.2.3 Design and maintenance

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[4] This guidance is reproduced from the HSE's guidance on the causes and prevention of slips and trips.

Is the floor suitable for the environment, fitted correctly and properly maintained? Are the walkways wide enough & level? Are stairs suitable; are risers consistent; are nosings highlighted where necessary; are usable handrails available? Environmental factors also fall into this category: is the lighting good enough for employees to see hazards; what about distractions that might prevent them from seeing where they are going?

5.3 Staff should report concerns about hazards which may cause slips, trips and falls using the School's *Health and Safety Reporting Form*.

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CITY OF LONDON SCHOOL FOR GIRLS

SPECIAL EDUCATIONAL NEEDS AND DISABILITY POLICY

Policy last reviewed by:	Kathleen O'Connor and Emma Hestletine
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

Contents

This Special Educational Needs and Disability Policy takes into account:

- The Special Educational Needs and Disability (SEND) Code of Practice: for 0 - 25yrs (September 2014)

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- The Equality Act 2010
- The Children and Family Act (April 2014)
- Teachers Standards 2012 Section 5
- CLSG Accessibility Plan
- CLSG Pupil Mental Health Policy
- CLSG Medical Conditions, Medicines and Infection Control Policy
- JCQ (Joint Council for Qualifications) Access Arrangements and Reasonable Adjustment Guidelines

1. Overview

1.1. City of London School for Girls (CLSG) is an academically selective school catering for girls of high academic ability. Pupils are admitted by competitive examination and are selected on the basis that they will be able to cope with an intensive academic curriculum.

1.2. It is our belief that all pupils can achieve their academic potential, regardless of need. It is recognised that some pupils will require additional, specific provision to do this and it is our aim to provide this support as required. Therefore, in keeping with the Equality Act (2010), the non-statutory guidelines within the SEND Code of Practice (2015) and the Children and Families Act (2014), the school will strive to make all reasonable adjustments to support pupils with SEND.

1.3. It is the policy of CLSG, wherever possible, to provide all pupils with a balanced, broad and stretching curriculum and to ensure full entitlement and access to all pupils who have satisfied the entrance requirements. Whilst due recognition will be given to the SEND of any pupil, all pupils are expected to demonstrate respect for self and others; responsibility for their own learning and development; and demonstrate resourcefulness. Adherence to the school's Code of Conduct as presented in the Behaviour Management Policy is a requirement of all pupils.

2. Definition of Special Educational Needs

A pupil is said to have special educational needs if her learning difficulty or disability calls for special educational provision to be made for her.

2.1 A pupil has a learning difficulty or disability if she:
   a) has a significantly greater difficulty in learning than the majority of her peers or
   b) has a physical or mental impairment which has a substantial and long-term adverse effect on her ability to carry out normal day-to-day activities.

(Section 6), Equality Act 2010.

2.2 The above definition includes sensory impairments such as those affecting sight or hearing, long term health conditions such as asthma, diabetes, epilepsy, cancer and mental health concerns.

2.3 It should be noted that under the Equalities Act 2010 'hidden' impairments such as Dyslexia, Autism, ADHD may qualify as a disability and are therefore subject to reasonable adjustment duties. At CLSG this usually comes in the form of 1:1 or small group tutorials, if it is felt that a pupil's needs cannot be addressed in the classroom.

2.4 The SEND Code of Practice identifies four areas of need:

- Communication and Interaction
  This includes pupils who are on the autistic spectrum, and/or pupils with speech, language and communication needs (SLCN).

- Cognition and Learning
  This includes pupils with specific learning difficulties, including Dyslexia Dyspraxia, and Attention Deficit Hyperactivity Disorder (ADHD).

- Social, Emotional and Mental Health Difficulties
  This may include pupils who have a wide range of social and emotional and/or mental health difficulties which can manifest themselves in a variety of ways including self-harm, eating disorders, depression and/or anxiety, substance misuse or physical symptoms which are medically unexplained.

- Sensory and/or Physical needs
  This includes pupils with a physical disability (e.g. vision impairment (VI), hearing impairment (HI)). Pupils with such needs may require additional, on-going support and equipment to access the curriculum.

Please note, a pupil might fall into one of more of the categories listed above.

It should be noted that the school will make best endeavours to meet the requirements any individual within the context of 'reasonable adjustments' as required by the Equality Act (2010).

3. Identification of Need

3.1 Upon Application to the School
Upon application, Parents are required to inform the school of any specific learning or educational needs that their daughter requires. This will include sending copies of relevant professional reports, such as an assessment by an Educational Psychologist or medical professional. It is important that full details are provided so that the school can assess whether or not it can implement any required arrangement for entrance exams.

Whilst the school will pay due care to a pupil's requirements upon application, should a place be offered and accepted, any subsequent adjustments will be based upon evidence of need as it is presented within the context of the school and the pupil's learning at CLSG. Access arrangements awarded for entrance examinations do not automatically carry forward.

Following admission to the school, should any future needs become identified, the school will discuss how best to assess and meet these in conjunction with the pupil, parents, teaching staff and external agencies as appropriate.

For pupils with SEND who transition from the Preparatory Department to Senior School, the Learning Support Department will liaise with the Head of Prep regarding transition planning and transition meetings with each pupil and her parents.

3.2 Baseline Assessment

Whole year screening takes place in the first term of Year 7 or upon entry for midyear admissions, and measures ability in spelling, reading and comprehension skills. Such assessments form part of the school's monitoring and tracking of pupils' progress, and help the school identify potential needs in order to further support pupils. There is no additional preparation work to be done for these assessments.

3.3 Gathering Information

The school recognises that potential underlying difficulties might only emerge as a pupil progresses through the school. Teachers can raise SEND concerns about a pupil's learning via the school's internal "SEND Concern" referral system. In addition, the Learning Support Department holds regular monitoring meetings with Heads of Year to review pupils' progress. Pupils can also make self-referrals and parents can raise concerns directly to the department or via their daughter's Head of Year.

4. Objectives for CLSG in relation to SEND

When a pupil has been identified as having SEND the school will endeavour to:

4.1 Ensure full entitlement and access for pupils with SEND to high quality teaching within a broad, balanced curriculum so that they can reach their full potential and enhance their self-esteem.

4.2 Identify those pupils who have difficulties with learning which are significantly greater than the majority of pupils within the same age group and academic ability.

4.3 Supply information to the pupil and her parents outlining the support required and to take into consideration the views and feelings of the pupil and her parents.

4.4 Meet the needs of pupils with SEND with appropriate provision and resources. Where possible, this will be completed within school, but on occasions it may be necessary to advise parents to seek specialist assessment and/or teaching outside of school.

4.5 Advise and liaise with staff and parents on the identification of SEND and provide strategies for in-class support. Where necessary, the SENDCo responsible might recommend either an external or internal Educational Assessment.

CLSG is committed to the ongoing development of its Learning Support Department to better support the needs of pupils with SEND. The SENDCo holds a nationally recognised SENDCo qualification and specialist teaching qualification (AMDBA). In addition, the school has one full time Learning Support Teacher and one part-time Specialist Assessor/SEND Teacher.

The school has a designated governor for SEND.

5. Responsibility for Pupils at CLSG with SEND

5.1 All teachers at CLSG are responsible and accountable for the progress and development of all pupils in their classes. High quality teaching, differentiated for individual pupils where necessary, is the first step in responding to pupils who have or may have SEND.

5.2 CLSG will regularly review the quality of teaching for all pupils. This includes reviewing teachers' understanding of strategies to identify and support pupils with SEND.

5.3 Class and subject teachers, supported by Heads of Departments and/or Heads of Year carry out regular assessments of pupils' progress. These seek to identify pupils making less than expected progress. This can be characterised by progress which:

   5.3.1 is significantly below that of their peers starting from the same baseline

   5.3.2 fails to match or better the pupil's's previous rate of progress

   5.3.3 fails to close the attainment gap between the pupil and their peers (in line with her ability).

6. In School Support for SEND

When a pupil has been identified as having SEND, the school will take action to remove barriers to learning and put effective special educational provision in place. As per the SEND Code of Practice, the school adopts a graduated response to identification and support of pupils with SEND.

The school aims to:

- liaise closely with the pupil, her parents and staff to identify needs accurately and effectively and provide appropriate support
- adopt a pupil central approach to its provision and support
- liaise with outside agencies, as appropriate, to further support pupils as required.
- provide specialist in-house cognitive assessments as and when appropriate in consultation with a pupil, her parents/guardians and teaching staff
- liaise with pastoral staff to support the social and emotional well-being of pupils with specific needs or learning difficulties
- collaborate with subject teachers to ensure the needs of pupils with SEND are met
- monitor and review the progress of pupils in line with the school's tracking and reporting procedures
- support students to:
  - to develop effective learning habits, including study and revision skills
  - to further support and develop reading and writing skills
  - to develop problem solving strategies
- specialist specific learning difficulties (dyslexia) teaching, as and where appropriate
- provide staff with relevant and accurate descriptions of pupils' needs and teaching strategies to support their learning
- provide ongoing CPD for staff

6.2   Learning Support List and Monitoring List

The school's Learning Support List provides teaching staff with an up-to-date record of pupils in the school who have identified SEND. It details their areas of need and provides advice on appropriate teaching strategies.

The Learning Support Department also keeps a record of pupils who may have received support or intervention from the department but who do not meet the criteria for the Learning Support List. This list may also include students with SEND who responded well to intervention and as a result their needs are no longer a significant barrier to their learning. The progress of these students may be monitored for a period of time before being completely removed from tracking lists.

As the school adopts a graduated response and "plan, do, review" approach to its work, these lists are reviewed and updated regularly.

6.3   Personalised Learning Plans

A Personal Learning Plan (PLP) may be prepared in collaboration with the key stakeholders depending on the pupil's level of need. A PLP will reflect a pupil's strengths and areas of need and

provide specific teaching strategies to meet the particular needs of the pupil. PLPs should be regularly reviewed and updated, in line with guidance from the Code of Practice.

6.4 External Specialist Reports

In some cases, an external Educational Psychologist (EP) or other professional may be required to assess a pupil. The school may advise parents/guardians of the benefits of such support and the benefits of the school liaising closely with such professionals. Parents/guardians should share professional reports with the school in order to establish and agree support in school.

Please note that when parents/guardians are advised to seek assessment by an outside professional, or engage a Specialist Teacher to assist their daughter beyond the scope of the extra help available from the school, any charges arising will be borne by the parents/guardians and not by the school. For bursary funded pupils who require an external assessment, CLSG may be able to offer financial assistance.

Please refer to the Access Arrangements section for further information on the use of specialist teacher/EP reports for access arrangements.

7. Educational, Health and Care Plans (EHC Plans)

For a prospective pupil with an EHC Plan, the school will consult the pupil's parents/guardians and, where appropriate, her current school and Local Authority to ensure that the provision can be delivered by the School.

As per the Children and Families Act (2014), it is the legal responsibility of the pupil's Local Authority to arrange the provision specified in a Plan.

8. Role of the Head of Learning Support/SENDCo

The Head of Learning Support/SENDCo has overall responsibility for SEND provision across the entire school and has the following key responsibilities:

8.1 Overseeing the day-to-day operation of the school's SEND policy

8.2 Co-ordinating provision for pupils with SEND

8.3 Liaising with all the relevant staff who teach/support pupils with SEND

8.4 Advise on the graduated approach to provide a pupil with SEND

8.5 Management of the SEND budget

8.6 Liaising with parents of pupil's with SEND.

8.7 Liaising with internal professionals, such as the School Counsellor and School Nurse, as appropriate to support the needs of pupils

8.8 Liaising with external professionals, including educational psychologists, medical professionals and professionals from other schools and/or institutes of education to support the needs of pupils as appropriate.

8.9 To work with SMT and the Headmistress to ensure that the school meets its responsibilities under the Equality Act (2010) with regard to reasonable adjustments and access arrangements.

8.10 To provide support and training for staff to ensure they have the ability to identify SEND and adapt their teaching if necessary to provide differentiated quality first teaching.

8.11 To attend regular training and INSET sessions relevant to the role

8.12 To regularly meet with the school Pastoral Team comprising of Heads of Section, School Counsellors and Deputy Head Pastoral.

9. Medical Conditions

The school's Pastoral Team, including the school nurse, is involved in the care of girls with any serious medical conditions. Please refer to the 'Medical Conditions, Medicines and Infection Controls Policy for further information.

10. Mental Health

The school has specific legal responsibilities towards pupils whose mental condition falls within the definition of disability under the law. This requires us to ensure that pupils with a well-recognised mental illness are not disadvantaged and that reasonable adjustments are put in place to support their learning. Please refer to our policy 'Pupil Mental Health' for further information.

11. Resources and Diagnostic Testing

The Learning Support Department has a range of resources to develop the skills of pupils and it is the role of the SENDCo to keep informed of any new resources that will be beneficial to the school.

The department is well-equipped with diagnostic tests which enables its specialist teachers to carry out a battery of educational assessments in school. For further, more specialist advice,

parents/guardians may be asked to take their daughter to a recommended professional, for example, an Educational Psychologist for assessment.

12. Exam Access Arrangements

The regulations for Access Arrangements for public examinations are determined by the Joint Council for Qualifications (JCQ) and other relevant Awarding Bodies, such as Cambridge International Examinations (CIE).

The regulations are designed to ensure no candidate is placed at a substantial disadvantage in comparison to her peers as a result of a specific need or learning difficulty and, equally, that no candidate should be unreasonably advantaged by the provision of an access arrangement for which significant evidence of need is not apparent.

In order to justify the requirements for a specific access arrangement, evidence has to be presented to demonstrate a history of need and how a candidate would be at a substantial disadvantage in comparison to someone who is not disabled if the arrangement were not in place.

As an Examinations Centre, the school is required to ensure that any adjustments are based upon evidence of need. Permitting access arrangements which are not supported by appropriate evidence constitutes malpractice by the Centre and could, ultimately, lead to the recall of certificates.

Whilst careful attention will be paid to the contents of historically commissioned external reports from Educational Psychologists, these will not, in themselves, constitute definitive evidence of need nor enable automatic eligibility for access arrangements to be granted.

Equally, external assessments commissioned by parents may not be used as evidence for access arrangements by the school unless there is an established working relationship between the external assessor and the school. Prior to assessment, the school should have provided background information to the external professional such that the school and the assessor are working together to ensure a joined up and consistent approach.

It is important to recognise that Access Arrangements awarded at previous schools are not automatically carried forward and do not guarantee eligibility for exam Access Arrangements at CSLG. All pupils who arrive with external reports must be made aware that the school will, in most cases, re-assess irrespective of previous recommendations.

If a pupil's performance within the school suggests that they may require specific access arrangements to be made for public examinations, the views of the pupil, her parents/guardians and subject teachers as well as evidence of performance within the school will be collated in order to demonstrate a clear picture of need. With permission, one of the school's qualified assessors will carry out an assessment using a range of nationally standardised tests from those approved by the

JCQ. Subject to pupil and parental agreement, the reports of external professionals who have liaised closely with the school to identify a pupil's needs may also be used when making an application. Only with the appropriate evidence can an application be made for specific access arrangements. Parents will be provided with assessment results and, if necessary, an application for a specific access arrangement will be made.

Where Access Arrangements are required as a result of a long term medical condition, the professional diagnosis should ensure there is clear and substantial evidence for an arrangement to be made as a direct result of the candidate's long term and continuing medical needs presenting a persistent and significant barrier to learning.

Pupils with exam Access Arrangements are awarded such arrangements as their standard way of working in school (classwork and internal assessments and tests) as well as in public examinations.

The use of a word processor is one type of Access Arrangement. Please refer to Appendix A, the school's Word Processing Policy, for further information on the use of word processors at CLSG.

Final decisions about examination concessions for internal and public examinations rest entirely with the school in its capacity as an examination centre.

13. Evaluation of SEND Provision

13.1   The school's SENDCo liaises regularly with the Deputy Head Academic, Head of Senior School, Head of Lower School, Head of the Preparatory Department, Heads of Year, School Nurse and Exams Officer.

13.2   The school's SEND Policy and Developmental plan are updated regularly and adjustments made as appropriate and when necessary.

13.3   Annual lesson observations of teachers should include recognition and evaluation of SEND provision.

13.4   It is the aim that additional SEND support provided is monitored, adjusted and reviewed with pupils, parents/guardians, and relevant staff.

13.5   Currently SEND support is measured in the following ways:

- Subject assessments
- Internal and external examinations
- End of term reports
- Parents' Evenings
- Personal Learning Plans
- Diagnostic testing

- Book looks
- Learning Walks
- School leavers destinations

14. Planning the Transition into Post 16, Universities, Training and the Workplace

14.1 Pupils at CLSG entering post-16 education should have access to supportive provision allowing them to build on their achievements.

14.2 The SENDCo will liaise with the Head of Sixth Form, Head of Senior School and Head of Careers before the pupil approaches the transition point. Similarly the SENDCo will support pupil and parents liaise with relevant educational providers or employers to ensure that relevant information about previous SEND provision is shared appropriately.

14.3 The pupil's Local Authority will be able to offer advice on the financial support available to pupils in higher education and how to claim it, including the Disabled Students Allowance (DSA).

14.4 DSAs are available to help pupils in higher education with the extra costs they may incur on their course because of a disability. Applications for DSA can be made to StudentFinance application services. This varies from year to year, but generally at least six months before the start of the academic year in which the young person is expecting to take up a place.

15. Arrangements for Dealing with Complaints

15.1 Any serious complaints relating to SEND provision will be dealt with using the school's Complaints Procedure.

15.2 Most complaints are likely to be minor and to arise from misunderstandings, which can quickly be resolved by conversations involving the SENDCo, staff, parents and pupils, as appropriate.

16. City of London Local Offer

For information on the City of London's Local Offer please click here.

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Page 4: [3] Deleted	Justine Venditti	29/05/2020 14:41:00
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Page 5: [5] Deleted	Justine Venditti	29/05/2020 14:47:00
Page 7: [6] Deleted	Justine Venditti	29/05/2020 14:51:00
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CITY OF LONDON SCHOOL FOR GIRLS

ENGLISH AS AN ADDITIONAL LANGUAGE (EAL) POLICY

Policy last reviewed by:	Kathleen O'Connor and Emma Heseltine
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

1. Introduction

The purpose of this policy is to outline the school's approach to identification and meeting the needs of pupils who are classified as having English as an additional language.

2. Definition

An EAL pupil is a pupil whose first language is not English. An individual's first language is considered to be that to which she was initially exposed and which has continued to be the primary language used at home.

As a school at the heart of a city that serves a global community, the school recognises and welcomes the multi-lingual abilities of its pupils and its social and cultural diversity are central to the school's identity. However, as an academically selective school, all pupils need to have a level of English proficiency that enables them to benefit from the education the school provides.

3. Objectives

We promote the principles of fairness and justice for all through the education that we provide in our school, so that our pupils are able to realise their full potential academically and socially and to develop as responsible citizens.

We aim to achieve the following objectives:

- To support EAL learners in their development of English language skills;
- To monitor the progress of EAL learners;
- Ensuring that every teacher is aware that they have responsibility for the language development of an EAL learner;
- The Learning Support Co-ordinator oversees the identification, monitoring and provision of EAL learners and their progress.

4. Identifying EAL

The school refers to the Department for Education's EAL guidance to make a 'best fit' judgement as to the overall proficiency of English stage to which the learner most closely corresponds[1]. It also follows advice and guidance from NALDIC (National Association for Language Development in the Curriculum) and The Bell Educational Trust when assessing and supporting learners.

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[1]
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/665127/Data_on_pupil_nationality__country_of_birth_and_proficiency.pdf

The nature of CLSG is such that all pupils are at least competent users of English; entry requirements to the school's Prep and Lower School consists of successfully completing an academically challenging examination whilst, at Sixth Form, a minimum grade 7 (or equivalent) in GCSE English is required, along with a minimum GCSE grade 7 in those subjects the pupil wishes to study.

Information regarding a pupil's first language and level of fluency is sought upon application to the school, whilst other sources of information, such as baseline assessments and monitoring of attainment and progress, can help assess a pupil's fluency.

The above information is stored safely and securely on the school's network and data management system. Relevant information is shared with teachers, in conjunction with and agreement from the pupil and her family.

5. Provision

For some pupils, additional language support may be required at different stages along their educational journey at CLSG.

Subject teachers are expected to provide support to EAL learners with the development of fluent written expression and the acquisition of subject specific language.

Whilst specialist EAL teaching is not provided at the school, the Learning Support Department are able offer linguistic support in developing written fluency, idiomatic expression and support for the understanding of subject specific vocabulary.

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CITY OF LONDON SCHOOL FOR GIRLS

IT & E-SAFETY POLICY

Policy last reviewed by:	Michael Martyn, Rachel Brincat
Date last reviewed:	September 2020
Approved by:	
Date approved:	

Contents

1

1. Introduction

1.1 The City of London School for Girls recognises that the internet and other digital technologies provide a vast opportunity for children and young people to learn. Unlike any other mode of technology, the internet and digital technologies allow all those involved in the education of children and young people to promote creativity, stimulate awareness and enhance learning. It is essential that this policy is read and used in conjunction with other school policies.

1.2 As part of our commitment to learning and achievement The City of London School for Girls wants to ensure that the internet and other digital technologies are used to:

- Raise educational standards and promote pupil achievement.
- Develop the curriculum and make learning exciting and purposeful.
- Enable pupils to gain access to a wide span of knowledge in a way that ensures their safety and security.

To enable this to happen, we have taken a whole school approach to eSafety which includes the development of policies and practices, the education and training of staff, pupils and parents and the effective use of the School's IT infrastructure and technologies. E-safety is an essential strand of Safeguarding and Child Protection at CLSG.

1.3 The City of London School for Girls as part of this policy, holds steadfastly to the ethos that there should be an equitable learning experience for all pupils using IT technology. We recognise that IT can allow all pupils increased access to the curriculum and other aspects related to learning.

1.4 The City of London School for Girls is committed to ensuring that all its pupils will be able to use existing, as well as up and coming technologies safely. We are also committed to ensuring that all those who work with children and young people, as well as their parents, are educated as to the dangers that exist so that they can take an active part in safeguarding them.

1.5 The use of these new technologies can put young people at risk within and outside the school. The dangers that they may face include:

- Access to illegal, harmful or inappropriate images or other content.
- Unauthorised access to, loss of or sharing of personal information.
- The risk of being subject to grooming by those with whom they make contact on the Internet.
- The sharing/distribution of personal images without an individual's consent or knowledge.
- Inappropriate communication/contact with others, including strangers.
- Cyber-bullying.
- Access to unsuitable video/Internet games.
- An inability to evaluate the quality, accuracy and relevance of information on the Internet.

- Plagiarism and copyright infringement.
- Illegal downloading of music or video files.
- The potential for excessive use which may impact on the social and emotional development and learning of the young person.

2. Scope of policy

2.1   The policy applies to:

- All pupils
- All teaching and support staff (including peripatetic), contractors' employees working long term at the school and school governors and volunteers
- All aspects of the School's facilities where they are used by visitors, voluntary, statutory or community organisations.

2.2   The City of London School for Girls will ensure that the following elements are in place as part of its safeguarding responsibilities to pupils:

- A list of authorised persons who have various responsibilities for eSafety
- A range of policies including acceptable use policies that are frequently reviewed and updated
- Information to parents that highlights safe practice for children and young people when using the internet and other digital technologies;
- Adequate training for staff and volunteers
- Adequate supervision of pupils when using the internet and digital technologies
- Education that is aimed at ensuring safe and responsible use of internet and digital technologies
- A reporting procedure for abuse and misuse
- The school reserves the right to monitor the pupils' mobile and digital technologies and online activity through search engines and social media.

3. Roles and responsibilities

3.1. Technical Staff

Technical staff, led by the Director of IT and the Systems Manager, have a key role in maintaining a safe technical infrastructure at the school and in keeping abreast with the rapid succession of technical developments. They are responsible for the security of our hardware system. They are responsible for maintaining appropriate filtering of the internet and our data and for training our teaching and administrative staff in the use of IT. They monitor the use of the internet and emails and will report inappropriate usage by girls to the Deputy Head (pastoral) who is also the DSL, and to the E-safety Coordinator.

3.2. E-safety Coordinator

The E-safety Coordinator is responsible for devising and implementing a coherent approach to e-safety across the school as part of safeguarding, in consultation with the Director of IT, the DSL and the Head of PSHCEE, and in line with national best practice recommendations.

He/She is responsible for staff training on e-safety, for ensuring that there is an age appropriate e-safety curriculum for pupils on the responsible and safe use of IT and for disseminating information to parents on all matters of e-safety. He/she is also responsible for monitoring , logging and reporting any breaches of the IT code of conduct by pupils using the internal monitoring system IMPERO. He/she is also responsible for the annual review and update of e-safety policies and procedures and for keeping an up-to-date log of any safety breaches to the IT and E-safety policy and actions taken.

3.3. Pastoral Staff

The DSL has ultimate responsibility for all matters of safeguarding of pupils, including e-safety.

The DSL will decide on appropriate sanctions in conjunction with relevant pastoral staff (tutors and heads of section) when breaches of the IT and e-safety policy occur in accordance with this policy, the school's Anti-bullying policy and the Sanctions and Rewards policy. The DSL is responsible for keeping a log of all bullying incidents (including cyberbullying) and actions taken.

The DSL will also refer more serious instances where the well-being and safety of a child is seriously compromised by their online activity to the LSCB, the Police, CEOPS, the Local Prevent Coordinator and local Channel panel as appropriate.

3.4 Staff

As stated in our Safeguarding and Child protection policy, it is ultimately the responsibility of all staff, teaching and support, contractors' employees working regularly on the premises and volunteers to ensure the safety of the pupils at the school. They should therefore all exercise vigilance in ensuring that pupils are using IT safely and responsibly and report all concerns to the e-safety Coordinator and the DSL.

4. Policies and procedures

We at The City of London School for Girls understand that effective policies and procedures are the backbone to developing a whole-school approach to eSafety. The policies that exist at the school are aimed at providing a balance between exploring the educational potential of new technologies and building the resilience and providing safeguards to pupils to protect themselves and their peers.

4.1 Use of Internet Facilities, Mobile and Digital Technologies

4.1.1 The City of London School for Girls will seek to ensure that internet, mobile and digital technologies are used effectively for their intended educational purpose, without infringing legal requirements or creating unnecessary risk.

4.1.2 The City of London School for Girls expects all staff and pupils to use the internet, mobile and digital technologies responsibly and strictly according to the conditions below and to the IT Pupils' Code of Conduct and to the Staff's Acceptable Use of IT Policy, within the school's premises and beyond.[1] These expectations are also applicable to any voluntary, statutory and community organisations that makes use of the school's IT facilities and digital technologies.

Users shall not:

- Visit internet sites, make, post, download, upload or pass on, material, remarks, proposals or comments that contain or relate to:

  o Indecent still and moving images and sound files
  o Promoting discrimination of any kind
  o Promoting racial or religious hatred
  o Promoting illegal acts
  o Promoting extremist view and beliefs and terrorism
  o Any other information which may be offensive to peers or colleagues.

4.1.3 The School recognises that in certain planned curricular activities, access to otherwise deemed inappropriate sites may be beneficial for educational use. In such circumstances, there is an expectation that access is pre-planned and recorded so that it can be justified if required. Permission to access such sites supported by the relevant justification must be sought from the E-safety coordinator and the Director of IT. In some cases the Deputy Head Academic or Pastoral or the Headmistress will need to be contacted.

4.1.4 Incidents which appear to involve deliberate access to websites, newsgroups and online groups that contain the following material will be reported to the Police:

- Images of child abuse (images of children whether they are digital or cartoons, apparently under 16 years old, involved in sexual activity or posed to be sexually provocative)
- Adult material that potentially breaches the Obscene Publications Act in the UK
- Criminally racist or anti-religious material
- The promotion and advocacy of Extremism, violence, bomb making and terrorism
- Illegal taking or promotion of drugs

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[1] For the purposes of this document, Internet usage means any connection to the internet via web browsing, external email, news groups or messaging services, mobile technologies e.g. mobile phone, including Bluetooth applications, tablets etc. including 3G or 4G connection.

- Software piracy
- Other criminal activity

4.1.5   In addition, users may not:

- Use the City of London's or an equivalent broadband provider's facilities for running a private business.
- Enter into any personal transaction that involves City of London or member Local Authorities in any way.
- Visit sites that might be defamatory or incur liability on the part of the City of London or member Local Authorities or adversely impact on the image of the City of London.
- Upload, download, or otherwise transmit (make, produce or distribute) commercial software or any copyrighted materials belonging to third parties outside of the City of London, or to the City of London itself.
- Reveal or publicise confidential or proprietary information, which includes but is not limited to:
    - financial information, personal information, databases and the information contained therein, computer/network access codes, and business relationships.
- Intentionally interfere with the normal operation of the Internet connection, including the propagation of computer viruses and sustained high volume network traffic (sending or receiving of large files or sending and receiving of large numbers of small files or any activity that causes network congestion) that substantially hinders others in their use of the Internet.
- Use the Internet for soliciting, representing personal opinions or revealing confidential information or in any other way that could reasonably be considered inappropriate.
- Transmit unsolicited commercial or advertising material either to other user organisations, or to organisations connected to other networks, save where the material is embedded within, or is otherwise part of, a service to which the member of the user organisation has chosen to subscribe.
- Assist with unauthorised access to facilities or services accessible via the school's network.
- Undertake activities with any of the following characteristics:
    - wasting staff effort or networked resources, including time on end systems accessible via the school's network and the effort of staff involved in support of those systems;
    - corrupting or destroying other users' data;
    - violating the privacy of other users;
    - disrupting the work of other users;
    - using the City of London School for Girls' network in a way that denies service to other users (for example, deliberate or reckless overloading of access links or of switching equipment);
    - continuing to use an item of networking software or hardware after the City of London School for Girls has requested that use cease because it is causing disruption to the correct functioning of the school's network;

- other misuse of the City of London School for Girls network, such as introduction of viruses.
- Use mobile technologies 3/4G or mobile internet services in any way to intimidate, threaten or cause harm to others. Moreover, mobile technologies should not be used to access inappropriate materials or encourage activities that are dangerous or illegal.

4.2 Reporting Abuse and Misuse

If a pupil is in breach of the Information technology and e-safety policy, it should be reported to the E-safety Coordinator and the relevant pastoral staff (tutor, head of section and/or Deputy Head pastoral) using the online Cause for Concern system.

If a pupil is involved in or the subject of any type of online abusive or exploitative behavior via any form of electronic communication, including social media, it must be reported immediately to the DSL. Staff who have such concerns reported to them must pass it on to the DSL. Concerns may include bullying, harassment, grooming, child sexual exploitation, stalking or being drawn into terrorism.

In accordance with the Safeguarding and Child Protection Policy, staff may contact the LADO directly, or when there is evidence that the pupil is already engaged in illegal activity, including terrorism, the Police. Relevant contact details are in the Safeguarding and Child Protection Policy.

If a member of staff is in breach of the Information technology and e-safety policy, it should be reported to the Deputy Head (staff).

Staff may contact the police directly if there is evidence that the member of staff is already engaged in illegal activity including terrorism.

If a member of staff is involved in or the subject of online abuse via email of other form of electronic communication such as social media by another member of staff, it should be reported to the Deputy Head (staff).

If a pupil or a member of staff accidentally accesses a website that contains abusive material they should immediately report this to the E-safety Coordinator.

Parents should bring any e-safety concerns to the attention of the e-safety coordinator or the DSL.

5 Education and training

5.1 The City of London School for Girls recognises that the internet and other digital technologies can transform learning, help to improve outcomes for children and young people and promote creativity; all of which add up to a more exciting and challenging classroom experience.

5.2   As part of achieving this, we want to create within City of London School for Girls an accessible system, with information and services online, which support personalised learning and choice. However, we realise that it will be necessary for our pupils to have the skills and knowledge to enable them to use the internet and other digital technologies safely.

5.3   To this end, The City of London School for Girls will:-

- Provide a comprehensive programme of e-safety education to enable all pupils to stay safe online by becoming aware of the main threats posed to their safety and personal identity online, how to build resilience and how to report concerns. Pupils will be taught how to use technology responsibly, including what constitutes illegal use of online technologies and how to take care of their digital footprint, and how to exercise the skills of critical awareness, digital literacy and good online citizenship as part of PSHCEE and Computer Science. They will also be taught to understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy; recognise inappropriate content, contact and conduct and know how to report concerns.

- Educate school staff so that they are equipped to support pupils in gaining positive experiences when online and can help pupils develop strategies if they encounter a problem. Training on e-safety matters is carried out annually as part of the school's annual safeguarding training.

- Support parents in gaining an understanding of the policies and procedures that govern the use of internet and other digital technologies for all pupils at all times as well as providing them with up-to-date advice on how to best support their children's responsible and safe use of technologies at home. Parents can access an e-safety page on the portal with relevant resources and parent information evenings are organised regularly to disseminate information.

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- Foster pupil resilience to extremism through the active promotion of British values and due regard to the Prevent Duty.

- Provide appropriate filtering of internet access through school or wireless system.

6   Infrastructure and technology

6.1   Partnership working

The City of London School for Girls will, as part of its wider safeguarding responsibilities, seek to ensure that voluntary, statutory and community organisations take an approach to their activities that sees the welfare of the child as paramount. To this end, we expect any organisation using the school's IT or digital

technologies to have appropriate policies and procedures that are aimed at safeguarding children and young people and reporting concerns. Relevant checks will be carried out by the Bursar.

7   Standards and inspection

The City of London School for Girls recognises the need to have regular reviews of policies and procedures in order to ensure that its practices are effective and that the risks to pupils are minimised. The Safeguarding and Child Protection policy is reviewed annually, and so are the Information Technology and E-safety Policy, the Pupil's IT Code of Conduct and the Acceptable User policy for staff. A report on e-safety matters is part of the annual safeguarding report that goes to the Board of Governors.

7.1 Monitoring

7.1.1   Monitoring the safe use of the internet and other digital technologies goes beyond the personal use of the internet and electronic mail that any pupil or member of staff may have. City of London School for Girls recognises that in order to develop an effective whole school eSafety approach there is a need to monitor patterns and trends of use inside school and outside school (Education and Inspections Act 2006, Section 89(5)).

7.1.2   With regard to monitoring trends within the school and individual use by school staff and pupils, City of London School for Girls will audit the use of the internet and electronic mail in order to ensure compliance with this policy. The school will also work with its internet service provider to further ensure compliance.

7.1.3   The E-safety Co-ordinator keeps a log of all breaches to the IT and E-safety policy and actions taken.

7.1.4   Filtering is applied to the school network and to the wireless network. Websites are blocked in categories and restrictions vary in age-appropriate ways. There is no access to any illegal material as detailed in 3.1. Staff or parents can also report additional websites that they believe should be blocked via the IT Support Help Desk by emailing itsupport@clsg.org.uk.

7.1.5   A Mobile Device Management (MDM) system is used to administer   the deployment, security, monitoring and integration of school issued mobile devices within the school environment. Its intention is to optimise   the functionality and the security of mobile devices by providing   device configuration settings including device functionality, application and cloud restrictions.

7.1.6   In addition, monitoring of the students' use of the IT network is carried out using a system called IMPERO This system takes a

screenshot of any inappropriate language when using any software or a web browser. The screenshots record information about the user and can then be accessed via email.

7.2   Sanctions

7.2.1   The City of London School for Girls has been careful to develop policies and procedures to support the innocent in the event of a policy breach and enable the School to manage such situations in, and with, confidence.

7.2.2   Where there is inappropriate or illegal use of the internet and digital technologies, and therefore a breach of the Information technologies and E-safety (Policy 9 and its appendixes) has occurred, the following sanctions will be applied:

- Child / Young Person

  o   The child/young person will be disciplined according to the Sanctions and Rewards policy, and/ or the Anti-bullying policy as appropriate. Sanctions may vary from a detention or withdrawal of access to the school network or internet, to suspension or exclusion in more extreme cases.
  o   Serious breaches may lead to the incident being reported to the Police, CEOPS, the LADO, Children's Social Care, the Prevent Coordinator, the local Channel panel (as appropriate) or other regulatory bodies.

- Adult (Staff and Volunteers)

  o   The adult may be subject to the City of London's disciplinary policy if it is deemed he/she has breached the Information Technology and eSafety Policy and its appendixes and/or the Employee Code of Conduct, the Corporation of London's Social Media Policy, the Safeguarding Policy and/ or the Teachers Standards.
  o   Serious incidents that involve breaches to the Safeguarding and Child Protection Policy, the Prevent Duty and the Teachers' Standards may also lead to the incident being reported to the Police, the NCLT, the DBS, the LADO, the Prevent Coordinator or the local Channel panel as appropriate.

8   Working in partnership with parents and guardians

8.1   The City of London School for Girls is committed to working in partnership with parents and guardians and understands the key role they play in the internet safety of their children, through promoting internet safety beyond the school premises. Parents are issued with a copy of this policy and its appendixes upon their daughter entering the school and will receive all relevant updates.

8.2   The E-safety coordinator is responsible for the regular dissemination of up-to-date information to parents and for the organisation of parental information evenings to enable parents to support their children's safe and responsible use of technologies.

8.3   The City of London School for Girls also appreciate that there may be some parents who are   concerned about the use of the internet, email and other digital technologies in school.   In such circumstances school staff will meet with parents and guardians to discuss their concerns and agree how to allow their child to fully access the curriculum, whilst remaining safe.

This policy must be read in conjunction with:

- Safeguarding and Child Protection Policy and its Annexes
- Sanctions and Rewards Policy
- Anti-Bullying Policy
- Pupil Code of Conduct
- Behaviour Management Policy
- Pastoral Care, Discipline and Exclusions Policy
- Teachers' Standards
- Data Protection Policy
- City of London Corporation Data Protection Policy.
- City of London Corporation Employee Code of Conduct
- City of London Corporation Disciplinary Policy
- City of London Corporation Social Media policy

9 APPENDICES OF THE E-SAFETY POLICY

9.1 PUPILS' IT CODE OF CONDUCT

The IT Code of Conduct applies to all pupil users of Information Technology (IT) at City of London School for Girls while on the school premises or beyond.

The philosophy of the school is to allow open access to the IT system but this is only possible if the students behave in a sensible and responsible manner. The school's general code of conduct requires that 'all members of the school community are treated decently and are allowed to get on with their work and other activities in a friendly, tolerant and purposeful atmosphere'. It is important that this concept is applied to the use of the IT system in order to allow the school to develop a cutting edge IT system which will enhance the learning experience of all students at the school.

I will:

- Keep my password safe, change it as necessary and not reveal it to anyone else
- Treat the IT facilities with care and leave the area clean and tidy when finished
- Only use the school's facilities for work related to school such as subject work, homework and course work, print as little as possible to conserve resources
- Use e-mail and public forums sensibly and constructively using good English
- Keep my mobile phone or other personal electronic device switched off and stored securely during the school day. Though I may use them during lunch times. This does not apply to devices issued to students by the school e.g. iPads which should be used as directed by the subject teacher.

I will not:

- Use the IT facilities, a mobile phone or any electronic device to access offensive or unacceptable material (such as pornography, sexist or racist material).
- Use email, blogs, forums or social networking sites whether accessed from a computer, mobile phone or any electronic device connected to the school's network, a mobile phone network or communicating via Bluetooth to send or encourage material which is pornographic, illegal, offensive or annoying or in any way invades another person's privacy.
- Publish any comments, still or moving images, sound files or videos about situations or individuals from the school community on blogs, forums or social networking sites in the Public Domain
- Use any part of the school's IT system, a mobile phone or any electronic device to tease or bully another person.
- Post anonymous messages or forward chain messages.
- Gain, or attempt to gain, unauthorised access to any part of the school's IT system.

- Make, or attempt to make unauthorised changes to any computer document or file.
- Gain, or attempt to gain, unauthorised access to any other computer system
- Download computer documents/files (including games, video clips, sound) without permission.
- Breach copyright regulations.
- Deliberately place a virus, malicious code, or other inappropriate program, onto the school computers
- Download software from the Internet (including screen savers, games, video clips, audio clips, *.exe files).

I understand that:

- The school runs auditing software which records inappropriate actions made by the student online or when using software and records all websites visited.
- E-mail is continually monitored and random checks may be made on user areas.
- The school may look at any files and data held in user areas.
- Use of the computer network, the Internet & email is a privilege which may be withdrawn if abused and further sanctions may follow.
- Use of the school's facilities for any unauthorised activity may be a criminal offence under the Computer Misuse Act (1990), will be treated as such by the school, and the appropriate authorities may be notified.
- Staff may confiscate personal equipment that is being used during the school day for periods of up to 5 days.
- Sanctions may be imposed on pupils who use their electronic equipment without consideration for others.

I will never:

- Tell anyone I meet on the Internet my home address, my telephone number or my school's name, unless my teacher specifically gives me permission.
- Send anyone my picture without permission from my parents/carer.
- Arrange to meet anyone in person without first agreeing it with my parents/carer and get them to come along to the first meeting.
- Stay in an Internet chat room if someone says or writes something, which makes me feel uncomfortable or worried, and I will always report it to a teacher or parent.
- Respond to unpleasant, suggestive or bullying e-mails or bulletin boards and I will always report it to a teacher or/parent.
- Tamper with hardware (including the connecting of personal or unauthorized equipment to the network), software or the work of others.

IT Acceptable Use Policy – in School

- The use of any program, including access to the internet, which has not been approved by your teacher, may result in a network or Internet ban.
- During lessons, listening to music or streaming media (watching videos) is not allowed unless it is directly related to the class activity and has been approved.

- Changing any of the computer settings including the logon domain name, cursor or desktop is strictly prohibited.
- Sharing your password/user area with others is unacceptable as is accessing anyone else's user area.
- Eating, drinking and irresponsible behaviour is not permitted in IT rooms under any circumstances.
- Using classroom computers and projectors is prohibited unless expressly authorised by a member of staff.
- Work must be saved using relevant filenames so that you can identify documents at a later date and must not be of an offensive nature. Documents saved with default filenames such as untitled, doc1, doc2 etc. will be deleted automatically without question.
- Work that is no longer required must be deleted.
- All work produced on the school network must be saved in your user area, an appropriate shared area or if authorised by the subject teacher, in the Cloud. Any work that is saved on the local machine or any other unauthorised location may be automatically deleted without warning.
- The downloading or installation of any executable file (exe or dmg on a Mac), game or software is prohibited.
- Faulty equipment should be reported to the class teacher or the IT Systems Manager as soon as possible.
- The use of pen drives is only permitted for storage of work documents, not software such as games & applications. Pen drives must only be used on school computers if you have up-to-date antivirus software on your home computer.
- Laser printers must only be used for printing on to standard paper. You must not use card or transparencies.
- Downloading software of any type whatsoever from the Internet is strictly forbidden as well as the viewing, printing or saving of unsuitable material e.g. pornographic, racist, sexist or otherwise offensive content.
- Attention should be paid to copyright laws when saving documents, sounds, pictures etc. from the Internet, especially when printing and integrating in other work.
- The use of the Internet at The City of London School for Girls is for educational purposes only. Other non-educational use such as text messaging, Instant messaging or chatting is not allowed unless explicitly permitted by the Director of IT.
- If you send email from school then it is your responsibility to ensure that anything you write is sensible, inoffensive, and will not be likely to reflect badly on the school. Emails sent from school are traceable to the originator. Spamming or pranking other computer users will be dealt with severely.
- Your user area and all of your files remain the sole property of The City of London and are subject to inspection at any time.
- These rules have been drawn up with reference to government guidelines on school computer and Internet use, and are not necessarily exhaustive, but explain the kind of behaviour and responsibility that is expected of you in school.
- You should be aware that the Director of IT has the ability to monitor everything that happens on the network. This includes the ability to view the contents of computer screens remotely, log the contents of all web sites and IP addresses contacted by a user including all email sent and received and logging of the time spent by a user on any computer in any part of the school.

Any user breaking these rules will have access to the school network and/or the Internet withdrawn and may well face further action under the Computer Misuse Act 1990. In addition, activities such as publishing inaccurate material relating to a student or a member of staff on the Internet may result in an action being taken in the civil courts for Defamation.

9.2 Staff Acceptable Use of IT Policy

9.2.1 Introduction

This policy is concerned with the security and authorised use of Information Systems (IS), including mobile telephones and iPADs provided to assist employees in the performance of their work duties. It is based on the City of London's 'IS and Communication Use' policy.

This policy will not breach an individual's right to privacy.

9.2.2 General Principles

Individuals are responsible for ensuring their unique user credentials for all work related information systems, including network access, are kept confidential (i.e. not shared with colleagues or written down and left in a non-secure place) and protected from misuse. Individuals are additionally responsible for "locking" their computer equipment whenever it is left unattended to ensure that unauthorised access is prevented.

9.2.3 Individuals should never:

- Use a colleague's user credentials to gain system access;
- Deliberately introduce viruses or other malware into a system;
- Disable antivirus software or inactivity timeouts set on their computer;
- Attempt to bypass or subvert system security controls, or use them for purposes other than those intended.

9.2.4 All communications equipment and information systems provided by the organisation remain the City of London School for Girls' property at all times and must not be removed from the business premises without the prior approval of the IT Department.

9.2.5 Whilst equipment and systems are provided for organisational use, limited and reasonable personal use will be permitted provided it does not negatively impact on service delivery.

9.2.6 Software must be used within the scope of the copyright and the terms and conditions of the end user licence agreement and any other applicable licences governing its use.

9.2.7   Employees must minimise the possibility of introducing malicious software to the City of London School for Girls' information systems e.g. by not opening unreliable or unknown data sources via e-mail or the internet.

9.2.8   City of London School for Girls data must be stored on the school's infrastructure only, except in limited circumstances where the temporary storage of data on non-City of London School for Girls equipment is permitted. All City data must be held in accordance with Data Protection principles. Work carried out on equipment without access to the network must be backed up regularly, uploaded to the network at the earliest opportunity and deleted from local drives.

9.2.9   Data must only be copied to removable or mobile media (e.g. laptop, VD, CD, mobile phone, etc) after an assessment of the risk of the device being lost, stolen or compromised has been made (i.e. consideration should be given to the sensitivity of the data). City data, regardless of its sensitivity, which is held on all such devices, should wherever practical be encrypted using the approved City encryption software or hardware device.

9.2.10 Limited (less than 10mb) non-work related data may be stored on the City of London School for Girls' IT infrastructure at the individual's own risk. Under no circumstances, however, should it be used to store unauthorised software or illegal copies of data such as music, films or images.

9.2.11 Access to certain data sources will be limited (e.g. inappropriate internet sites) in line with our commitment to equality and diversity or to safeguard our IT infrastructure.

9.2.12 Inappropriate (as defined by the Computer Misuse Act 1990, as covered in this policy) or excessive IT use is likely to constitute misconduct and be subject to the City of London's Disciplinary Procedure or criminal proceedings. The following are specifically prohibited:

- Attempting to access information or systems to which you have no right or authority;
- Connecting unauthorised or unlicensed devices or software to the school's infrastructure;
- Receiving or disseminating inappropriate or offensive material.

9.2.13 Further advice on this policy can be sought from the school's HR representative.

9.3 RESPONSIBILITIES

9.3.1. The IT Departmental staff are responsible for the security of the school's infrastructure and the maintenance of IT equipment.

9.3.2. Employees are responsible for the security of the IT equipment they operate and access to systems via their unique user credentials. Employees should, therefore, make themselves familiar with any security

policies, procedures or special instructions which relate to the information systems they use.

9.3.3. Employees must report any issues that breach this policy, or the related appendices, (including receipt of offensive materials via e-mail) to their line manager immediately.

9.4 MONITORING

9.4.1 IT use is routinely monitored corporately via the analysis of e-mail traffic, internet sites accessed and telephone records of calls made and received. Information on issues within City of London departments are provided to the Chief Officer to manage, in line with the City of London's employee data protection policy and code of conduct both of which can be found on the City of London's intranet.

9.4.2 The content of communication is not routinely monitored across the City of London, however, in specified circumstances such monitoring may be considered appropriate e.g. telephone calls being monitored for training purposes; where serious misuse of IT is suspected; or where potential criminal activity is suspected.

9.4.3. The reasons for, and conditions of, covert monitoring of the use of IT systems by individuals will be set out, in writing, in advance of such monitoring taking place.

Covert monitoring will only occur in circumstances where:

- Legislative provision allows for it; or
- Informing the individual would prejudice a criminal investigation or be prejudicial to the interests of the City of London.

Advice must be sought from City of London's Director of HR prior to covert monitoring taking place.

9.5 STAFF INTERNET ACCESS STATEMENT

9.5.1 Introduction

This statement supports the Acceptable Use of IT Policy and sets standards on appropriate internet use.

This statement applies to those who use the City of London School for Girls' Information Technology (IT) core infrastructure to connect to the internet.

9.5.2 General Principles

Internet access is provided to employees at the City of London School for Girls to facilitate efficient working practices.

The City of London School for Girls allows limited personal internet access, i.e. during breaks or before/after shifts.

The internet must not be used:

- To create/maintain, store or transfer corporate data other than for agreed operational purposes
- To solicit or carry out business activities for personal gain
- For gambling or playing games
- To access, create/maintain, store, transfer or publish statements, images, information or sounds:

  - which are potentially offensive, abusive or defamatory especially in relation to equal opportunities and employee complaints or which could lead to co-workers invoking the City of London's employee complaints procedure.
  - which constitute as pornography, paedophilia or other inappropriate sexually related material.
  - which constitute illegal activity.
  - which would bring The City of London School for Girls' into disrepute if details became public.

    This is not an exhaustive list.

Inappropriate or excessive internet use may lead to action being taken either through the City of London's disciplinary procedure or as a criminal offence.

Internet access may be withdrawn if it is abused.

Access to websites may be restricted due to operational needs, to ensure system security or because of their inappropriate nature.

Requests to access blocked websites for genuine organisational reasons must be submitted to the IT Service Desk.

The IT department will only provide internet access support for business related purposes.

Any personal purchases or transactions (in accordance with paragraph 4 above) are made at the individual's own risk.

9.5.3 Responsibilities

Line managers will ensure that internet usage does not negatively impact upon operations within The City of London School for Girls.

9.5.4 Monitoring

Internet usage will be monitored corporately, with issues being reported to departmental Chief Officers to manage, in line with the City of London's Data Protection Policy and Code of Conduct.

9.6 STAFF EMAIL, MESSAGING & SOCIAL MEDIA USE STATEMENT

9.6.1 Introduction

This statement supports the Acceptable Use of IT Policy setting standards on appropriate use of the school's Messaging services. Messaging services are those which include, but are not limited to; Email, Instant Messaging (IM) and SMS Text Messaging (SMS) and for the purposes of this statement include access to and use of 3rd party Social Media sites (such as Facebook, Twitter).

City of London School for Girls Messaging services and Social Media access are provided in order to facilitate efficient working, and to use communications to pursue the aims and objectives of the school.

Except where specifically known otherwise, messaging services and Social Media should be considered an insecure method of communication. Before transmitting any City of London School for Girls data via messaging services due regard must be given to the sensitivity of the data and the impact of it being intercepted, mis-delivered or it being later forwarded by a third party. Published City of London advice should be followed. i.e. Advice on Data Security, Advice – Risk Analysis for Sensitive Data. These documents are available on the City of London's Intranet.

Emails, in common with all information stored in hard copy or electronic formats, may be subject to disclosure to third parties, including the subject of a particular email, under the Data Protection and/or Freedom of Information Act, and in court proceedings.

This statement applies to all those who use the City of London School for Girls Information Technology (IT) core infrastructure to access the City of London School for Girls email and messaging systems and 3rd party Social Media sites.

9.6.2 General Principles

The school provides a number of messaging and communications services. Employees should be aware of them and the differences between them so as to ensure they use the most appropriate communications channel.

Employees should be cognisant of the issues which may arise from the use of instant messaging or social media for any communication or as part of a transaction where the City of London faces a potential legal, financial or reputational risk. It is extremely important if legal action is to be taken by the City, or is threatened against the City, that all correspondence and documentation is preserved, and to be able to compile a full record of all communications. Any messaging or social media communications used in business transactions must be stored as part of the audit trail of a transaction.

Messaging systems and Social Media sites must not be used to send or receive statements, images, information or sounds which:

- could bring the City of London Corporation into disrepute;
- are potentially offensive, abusive or defamatory especially in accordance with the City of London's equal opportunities and employee complaints policies;
- solicit or carry out business activities for personal gain;

- display or disseminate pornography, paedophilia or other inappropriate sexually related material;
- divulge non-public City data to unauthorised third parties;
- would constitute illegal activity

The City of London School for Girls allows limited personal use of Corporate messaging services. This includes the sending of non-work related messages between work colleagues.

Inappropriate or excessive use may lead to action being taken either through the City of London's disciplinary procedure or as a criminal offence.

Consideration must be given to limiting messaging distribution lists to those recipients who need the information. Messages should never be sent to 'everyone' in the City of London without approval from the Headmistress.

Recipient lines of messages should be carefully checked prior to sending, so as to ensure that communications are not accidentally distributed inappropriately. When sending emails to groups of parents BCC must be used. If you are not sure how to do this seek advice from the IT department.

Consideration must be given to the general housekeeping of Inboxes, in line with the City of London's Records Management principles.

Wherever practical employees should use 'short-cuts' to documents held in shared drives or folders instead of attaching files.

Employees should minimise the possibility of introducing malicious software to the City of London School for Girls' IT Network (e.g. unsolicited or non-work related attachments should not be opened).

Access to some attached file types may be restricted based upon operational needs or to ensure system security.

All messages must be responded to in line with the City of London's Service Response Standards.

Messaging access may be withdrawn if it is abused.

If information as set out in paragraph 9 above is received, it must be reported via line management immediately.

Appropriate training is available via the City of London's Desktop Training Services.

9.6.3 Email

Email provides a written means of communication both internally and with 3rd parties. Communications can be initiated without the need for the recipient to be available as they can read and respond at a later time.

Usually a copy of emails sent and received are automatically kept. Emails should be retained only for as long as is necessary and in accordance with all applicable legislation governing the retention of written records.

All external emails will automatically include the following disclaimer notice:

THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

Employees should use the 'out of office assistant' to advise when they are unavailable to respond to an email and when they are due to return. All out of office messages should usually include the following:

Please note that there is no auto-forwarding from this mailbox. Urgent matters should be redirected to:- xxx email address and/or xxx contact number.

All emails should include your email signature in the corporate format.

9.6.4 Messaging

Messaging provides an instantaneous means of communication. The City of London supports the use of Messaging for work related activities for short and immediate communication where there is no legal, financial or reputational risk to the City.

Messaging should not be used for communicating financial, contractual or sensitive information, decisions, historic or other information that we must retain for statutory purposes.

Messaging conversations if kept, are subject to the Freedom of Information Act, Data Protection Act and Environmental Information Regulations, if the information is held at the time of the request being received by the City of London Corporation. They are also disclosable in legal proceedings.

9.6.5 Short Message Service (SMS) Text Messaging

SMS refers to text messages using a school phone on a City of London contract.

SMS provides a written means of communication both internally and with 3rd parties. Communications can be initiated without the need for the recipient to be available as they can read and respond at a later time.

SMS should not be used for communicating financial, contractual or sensitive information, decisions, historic or other information that we must retain for statutory or Council purposes where this information is not also recorded elsewhere.

SMS campaigns, contacting multiple members of the public, should only be undertaken with the approval of the Headmistress.

All SMS communications will usually be automatically retained. Employees should routinely delete these messages unless there is a specific business case for retaining them. Employees should be aware that although the City policy is not to record or keep SMS messages, other organisations and individuals with whom you communicate may have a different policy.

SMS records, are subject to the Freedom of Information Act, Data Protection Act and Environmental Information Regulations, if the information is held at the time of the request being received by the City of London Corporation. They are also disclosable in legal proceedings.

9.6.6 Social Media

All City of London Corporation employees must abide by the Social Media policy

Social Media is a term covering multiple forms of communications (blogging, tweeting, etc) through social media websites. Typically, this is a written means of communication with 3rd parties.

The nature of social media means that all communications should be regarded as public information which virtually any individual could see.

Employees are individually responsible for any content they publish on social media sites.

To be effective users of social media sites should be mindful of their audience:

- write in an appropriate style
- be conscious that English may not be their first language.
- be aware of what is being asked, and the answer you give.
- where appropriate, re-direct customers to other information sources such as the City of London School for Girls website, Public Relations, Contact Centre, etc.

Always exercise good judgement in communications and do not:

- disclose any non-public information
- make judgement upon, slur, demean or communicate in a derogatory manner.

- violate the City of London's privacy, confidentiality and legal guidelines. Please seek guidance and permission before publishing or reporting on conversations that are meant to be private or internal to the City of London.

Comply with copyright and where appropriate credit others for their work.

Participation in social media on behalf of the City is not a right but an opportunity. Please treat it seriously and with respect.

Social Media sites will each have their own data retention policy. In some cases this may extend to "never" deleting data.

Please refer to the school's Safeguarding and Child Protection Policy. The following section is taken from Annex B of the Child Protection Policy:

- Be extremely careful over the use of Facebook, YouTube and any other social media.
- Make sure your privacy settings on social networking sites are at the highest possible level to avoid IT savvy pupils being able to access any private material.
- Never accept a student, parent or a recent leaver as a "friend" on Facebook etc.
- If you need students, parents or recent former pupils to contact you via Facebook, Twitter or the like for a school related activity (e.g. for a team or trip), set up a special separate site and let the DSL and Director of IT know what you have arranged and why.
- Always use your school e mail address and students' school e mail addresses when communicating with pupils by email.
- For anything apart from the most routine delivery and return of work or any learning-related queries, copy in your HOD or another appropriate colleague to all e mail exchanges with students and parents.
- Use a school mobile phone rather than your private phone for school activities and contacting students and parents. If enough warning is given these can be borrowed from the school.
- Only contact a student on her mobile phone or keep her number on record if there is a real need to do so and make sure that you inform your HOD or another appropriate colleague about why you are doing so.
- Apply common sense and professional judgement in all your electronic contacts with students and parents.

Further advice and guidance on the use of social media and 'how to engage' is available on the City of London's Public Relations' web pages and employees should read this prior to engaging in public forums.

9.6.7 Monitoring

Line managers will ensure that messaging use does not negatively impact upon operations within the City of London.

Messaging usage will be monitored corporately, with issues being provided to departmental Chief Officers to manage, in line with the City of London's employee data protection policy and the code of conduct.

CITY OF LONDON SCHOOL FOR GIRLS

POLICY ON PUPILS' USE OF IT, MOBILE PHONE AND OTHER ELECTRONIC DEVICES

Policy last reviewed by:	David Libby. Neil Codd, Michael Martyn
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

Contents

1. IT in the Curriculum

Technology has transformed the entire process of teaching and learning at City of London School for Girls. It is a crucial component of every academic subject~~, and is also taught as a subject in its own right~~. All of our classrooms are equipped with digital screens, projectors and computers. We have a number of computers in school (in the library, Sixth Form work room, C floor corridor) which pupils may use for private study.

All of our pupils are taught how to research on the Internet and to evaluate sources. They are educated into the importance of evaluating the intellectual integrity of different sites, and why some apparently authoritative sites need to be treated with caution. Some sites that appear to be serious, impartial, historical sites, actually masquerade as sources of racist, homophobic, jihadist or other propaganda. Some free, on-line encyclopaedias do not evaluate or screen the material posted on them.

2. The role of technology in our pupils' lives

Technology plays an enormously important part in the lives of all young people. Sophisticated mobile devices provide unlimited access to the internet and services such as instant messaging blogging, video calls e.g. Skype/Facetime, wikis, chat rooms, social networking sites e.g. Facebook, Instagram and Tumblr and video sharing sites such as YouTube.

This communications revolution gives young people unrivalled opportunities. It also brings risks. It is an important part of our role at CLSG to teach our pupils how to stay safe in this environment and how to avoid making themselves vulnerable to a range of risks, including identity theft, bullying, harassment, grooming, stalking and abuse. They also need to learn how to avoid the risk of exposing themselves to subsequent embarrassment.

3. Role of our technical staff

With the explosion in technology, we recognise that blocking and barring sites is no longer adequate. We need to teach all of our pupils to understand why they need to behave responsibly if they are to protect themselves. This aspect is a role for our Designated Safeguarding Lead and our pastoral staff. Our technical staff have a key role in maintaining a safe technical infrastructure at the school and in keeping abreast with the rapid succession of technical developments. They are responsible for the security of our hardware system, our data and for training our teaching and administrative staff in the use of IT. They monitor the use of the internet and emails and will report inappropriate usage to the pastoral staff.

4. Role of our Designated Safeguarding Lead

We recognise that internet safety is a child protection and general safeguarding issue.

Our Designated Safeguarding Lead (DSL) has been trained in the safety issues involved with the misuse of the internet and other mobile electronic devices. SheHe works closely with the Local Safeguarding Children's Partnership (LSCP) and other agencies in promoting a culture of responsible use of technology that is consistent with the ethos of the school. All of the staff with pastoral responsibilities have also received training in e-safety issues and they are supported by the e-safety coordinator. The school's comprehensive PSHCEE programme on e-safety is the DSL's responsibility in consultation with the eSafety Coordinator and the Heads of Section. SheHe will ensure that all year groups in the school are educated in the risks and the reasons why they need to behave responsibly online. It is herhis responsibility to handle allegations of misuse of the Internet.

5. Promoting safe use of technology

Pupils of all ages are encouraged to make use of the excellent online resources that are available from sites such as:

Childnet International (www.childnet-int.org)
Digizen (www.digizen.org.uk)
Cyber Mentors (www.cybermentors.org.uk)
Cyberbullying (www.cyberbullying.org)
E-Victims (www.e-victims.org)
Bullying UK (www.bullying.co.uk)

They prepare their own models of good practice, which form the subject of presentations at assemblies and discussion in the meetings of the School Council. They cover the different hazards on the Internet, such as grooming, stalking, abuse, bullying, harassment and identity theft. Guidance covers topics such as saving yourself from future embarrassment, explaining that any blog or photograph posted onto the Internet is there permanently. Anything that has been deleted may be cached in a search engine, company server or internet archive and cause embarrassment years later.

6. Misuse: Statement of Policy

We will not tolerate any illegal material, and will always report illegal activity to the police and/or the Local Child Safeguarding Board (LCSB). If we discover that a child or young person is at risk as a consequence of online activity, we may seek assistance from the Child Exploitation and Online Protection Unit (CEOP). We will impose a range of sanctions on any pupil who misuses technology

to bully, harass or abuse another pupil or any member of the school community in line with our anti-bullying policy.

7. Involvement with parents and guardians

We seek to work closely with parents and guardians in promoting a culture of e-safety. We will always contact parents if we have any worries about their daughter's behaviour in this area, and we hope that they will feel able to share any worries with us. We recognise that not all parents and guardians may feel equipped to protect their daughter when they use electronic equipment at home. We have arranged briefings for parents about the potential hazards of this exploding technology, and the practical steps that parents can take to minimise the potential dangers to their daughters without curbing their natural enthusiasm and curiosity, and continue to plan such events, in particular in conjunction with the Friends of CLSG.

8. IT Code of Conduct

The IT Code of Conduct applies to all users of Information Technology (IT) at The City of London School for Girls.

The Philosophy of the school is to allow open access to the IT system but this is only possible if the students behave in a sensible and responsible manner. The school's general code of conduct requires that 'all members of the school community are treated decently and are allowed to get on with their work and other activities in a friendly, tolerant and purposeful atmosphere'. It is important that this concept is applied to the use of the IT system in order to allow the school to develop a cutting edge IT system which will enhance the learning experience of all students at the school.

I will:
Keep my password safe, change it as necessary and not reveal it to anyone else
Treat the IT facilities with care and leave the area clean and tidy when finished
Only use the school's facilities for work related to school such as subject work, homework and course work, except for games at lunchtime
Print as little as possible to conserve resources
Use e-mail and public forums sensibly and constructively using good English
Keep my mobile phone or other personal electronic device switched off and stored securely during the school day. Though I may use them during lunch times. This does not apply to devices issued to students by the school e.g. iPads which should be used as directed by the subject teacher.

I will not:

Use the IT facilities, a mobile phone or any electronic device to access offensive or unacceptable material (such as pornography, sexist or racist material)

Use email, blogs, forums or social networking sites whether accessed from a computer, mobile phone or any electronic device connected to the school's network, a mobile phone network or communicating via Bluetooth to send or encourage material which is pornographic, illegal, offensive or annoying or in any way invades another person's privacy

Publish any comments, images or videos about situations or individuals from the school community on blogs, forums or social networking sites in the Public Domain • Use any part of the school's IT system, a mobile phone or any electronic device to tease or bully another person

Post anonymous messages or forward chain messages

Gain, or attempt to gain, unauthorised access to any part of the school's IT system

Make, or attempt to make unauthorised changes to any computer document or file

Gain, or attempt to gain, unauthorised access to any other computer system

Download computer documents/files (including games, video clips, sound) without permission

Breach copyright regulations

Deliberately place a virus, malicious code, or other inappropriate program, onto the school computers

Download software from the Internet (including screen savers, games, video clips, audio clips, *.exe files).

I understand that:

The school runs auditing software which records inappropriate actions made by the student online or when using software and records all websites visited.

E-mail is continually monitored and random checks may be made on user areas

The school may look at any files and data held in user areas

Use of the computer network, the Internet & email is a privilege which may be withdrawn if abused and further sanctions may follow

Use of the school's facilities for any unauthorised activity may be a criminal offence under the Computer Misuse Act (1990), will be treated as such by the school, and the appropriate authorities may be notified.

Staff may confiscate personal equipment that is being used during the school day for periods of up to 5 days.

Sanctions may be imposed on pupils who use their electronic equipment without consideration for others.

I will never:

Tell anyone I meet on the Internet my home address, my telephone number or my school's name, unless my teacher specifically gives me permission

Send anyone my picture without permission from my parents/carer

Arrange to meet anyone in person without first agreeing it with my parents/carer and get them to come along to the first meeting

Stay in an Internet chat room if someone says or writes something, which makes me feel uncomfortable or worried, and I will always report it to a teacher or parent

Respond to unpleasant, suggestive or bullying e-mails or bulletin boards and I will always report it to a teacher or/parent

Tamper with hardware (including the connecting of personal or unauthorized equipment to the network), software or the work of others.

9. IT Acceptable Use Policy – in School

The use of any program, including access to the internet, which has not been approved by your teacher, may result in a network or Internet ban.

Listening to music or streaming media (watching videos) is not allowed unless it is directly related to the class activity and has been approved.

Changing any of the settings on a computer or any school issued digital devicesettings including the logon domain name, cursor or desktop is strictly prohibited.

Sharing your password/user area with others is unacceptable as is accessing anyone else's user area.

Signing into a school owned device with a private account or Apple ID is prohibited unless directed to do so by your teacher.

Eating, drinking and irresponsible behaviour is not permitted in IT rooms under any circumstances.

Using classroom computers and projectors is prohibited unless expressly authorised by a member of staff.

Work must be saved using relevant filenames so that you can identify documents at a later date and must not be of an offensive nature. Documents saved with default filenames such as untitled, doc1, doc2 etc. will be deleted automatically without question.

Work that is no longer required must be deleted.

All work produced on the school network must be saved in your user area, an appropriate shared area or if authorised by the subject teacher, in the Cloud. Any work that is saved on the local machine or any other unauthorised location may be automatically deleted without warning.

The downloading or installation of any executable file (exe or dmg on a Mac), game or software is prohibited.

Faulty equipment should be reported to the class teacher or the IT Systems Manager as soon as possible.

The use of pen drives is only permitted for storage of work documents, not software such as games & applications. Pen drives must only be used on school computers if you have up-to-date antivirus software on your home computer.

Laser printers must only be used for printing on to standard paper. You must not use card or transparencies.

Downloading software of any type whatsoever from the Internet is strictly forbidden as well as the viewing, printing or saving of unsuitable material e.g. pornographic, racist, sexist or otherwise offensive content.

Attention should be paid to copyright laws when saving documents, sounds, pictures etc. from the Internet, especially when printing and integrating in other work.

The use of the Internet at The City of London School for Girls is for educational purposes only. Other non-educational use such as text messaging, Instant messaging or chatting is not allowed unless explicitly permitted by the Director of IT.

If you send email from school then it is your responsibility to ensure that anything you write is sensible, inoffensive, and will not be likely to reflect badly on the school. Emails sent from school are traceable to the originator. Spamming or pranking other computer users will be dealt with severely.

Your user area and all of your files remain the sole property of The City of London and are subject to inspection at any time.

These rules have been drawn up with reference to government guidelines on school computer and Internet use, and are not necessarily exhaustive, but explain the kind of behaviour and responsibility that is expected of you in school.

You should be aware that the Director of IT has the ability to monitor everything that happens on the network. This includes the ability to view the contents of computer screens remotely, log the contents of all web sites and IP addresses contacted by a user including all email sent and received and logging of the time spent by a user on any computer in any part of the school.

Any user breaking these rules will have access to the school network and/or the Internet withdrawn and may well face further action under the Computer Misuse Act 1990. In addition, activities such as publishing inaccurate material relating to a student or a member of staff on the Internet may result in an action being taken in the civil courts for Defamation.

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CITY OF LONDON SCHOOL FOR GIRLS

MISSING CHILD POLICY

Policy last reviewed by:	Susannah Gilham
Date policy last reviewed:	
Approved by:	
Date approved:	

This policy should be read in conjunction with:

- Parents' Handbook
- ⁄Prep Parents' Handbook
- Pupil Code of Conduct
- School Health and Safety Policy
- Educational Visits Policy
- School Contingency Plan

1. Introduction

The welfare of all of the children at the school is our paramount responsibility. Every adult who works at the school has been trained to appreciate that he or she has a key responsibility for helping to keep all of the children safe at all times. Our staffing ratios are generous and are deliberately designed to ensure that every child is appropriately supervised when she is in our care.

2. Procedure for dealing with a child who is missing from morning registration

2.1   Procedures for parents to follow in the case of pupil absence are set out in The Parents' Handbook.

2.2   Parents are requested to inform the school in advance of any planned absence, for example for medical or dental appointments which cannot be arranged during the school holidays.

2.3   Parents should write to the ~~girl's~~ pupil's Form Tutor in the first instance. The Form Tutor will use the appropriate code in the register on the day of the girl's absence to indicate the cause.

        In the case of a planned absences that is a day or longer, permission needs to be sought from the Head of Section in the first instance. The Head of Section may in turn refer to the Deputy Head (Pastoral) or the Headmistress.

2.4   In the case of unexpected absence, most typically because of illness, parents are requested to ~~telephone or~~ email the ~~school~~ Attendance Officer (attendance@clsg.org.uk) before 8.00am on the first day of the absence.

2.5   Morning registration takes place at 8.40am and registers are checked by the Attendance Officer ~~morning receptionist~~ who makes a list of any unexplained absences.

2.6   ~~This list is given to the duty school keeper?~~The Attendance Officer will then ~~who~~ check~~s~~ the rooms in which ~~girls~~ pupils listed as missing without explanation are timetabled to be taught, in order to ensure that they are not in fact in school and have been registered as absent in error.

2.7   The Attendance Officer ~~morning receptionist~~ telephones the parents or guardians of those who are absent without explanation to establish whether the girl is unwell or whether there is some other explanation for her absence of which they have failed to inform the school.

2.8   If Tthe ~~morning receptionist~~Attendance Officer is not able to make contact with the parents and guardians of those who are absent without explanation, they will email the Deputy Head (Pastoral), the Head of Section and the Head of Year to let them know. ~~e-mails a list of absentees to members of the Senior Management Team and Assistant Heads of Section, including an explanation where one has been discovered and highlighting unexplained absentees whose parents or guardians she has not been able to contact.~~

2.9   The Deputy Head (Pastoral) and/or the relevant Head of Section or ~~Assistant Head of Section~~Head of Year investigates those absences that continue to be unexplained, for example by calling the ~~girl~~ pupil on ~~her~~ their mobile phone, checking whether or not ~~her~~ their friends are aware of any reason why the ~~girl~~ pupil is not in school of which ~~her~~ their parents have failed to inform the school.

2.10   The Deputy Head (Pastoral) exercises her professional judgement on how to pursue any unresolved instances of unexplained absence, if necessary contacting the police or social services.

3. Procedures for dealing with children who missing during the school day

3.1   City of London School for Girls is located on a secure site. Once the school day has begun, there is only one entry and exit point via reception which is manned throughout the school day and which is covered by CCTV. Gates and fences are treated with anti-climb paint.

3.2   ~~Girls~~ Pupils cannot leave the school site without permission and must sign in and out if they are given permission to leave the school buildings.

3.3   Teachers take a register at the beginning of every lesson and make a note of who is absent.

3.4   If a girl is absent and there is no satisfactory explanation for her absence (e.g. she is absent from school for the day, has a music lesson or is with the School Nurse) the teacher reports ~~her~~ the absence to ~~her Head of Year~~the Attendance Officer at the earliest opportunity.

3.5   Unexplained absences from lessons of those who are registered as being in school are reported to the Deputy Head (Pastoral) or to the relevant Head of Section, who investigates the absence, organising a search of the premises if necessary.

3.6   In the very unlikely event of a pupil not being found when the premises are searched, and if it is suspected that they have managed to leave the school undetected (for

example if they have somehow managed to scale a fence), the school will contact the ~~girl's~~ pupil's parents or guardians and the police.

4. Procedures for dealing with children who go missing during educational visits away from the school site

4.1   All members of staff receive training on safety on educational visits, risk assessment and dealing with emergencies.

4.2   All educational visits are subject to a rigorous process of planning and approval which includes giving due consideration to staffing ratios and supervision arrangements.

4.3   ~~Girls~~ Pupils are kept under direct or remote supervision at all times and are given clear instructions of how to act if they do get lost or become detached from the party. This information includes teachers' contact mobile phone numbers and emergency rendezvous instructions.

4.4   If a child does get lost and cannot be contacted, the teachers in charge of the visit will contact the local police and will contact the school emergency SMT contact.

4.5   Staff will be deployed so that enough teachers remain with the main party to ensure their safety whilst others assist the authorities in the search for the missing child.

4.6   The school emergency SMT contact will activate the school's Contingency Plan in consultation with the Bursar and Headmistress.

5. Actions to be followed by staff once the child is found

5.1   Talk to, take care of and, if necessary, comfort the child.

5.2   Speak to the other children to ensure they understand why they should not leave the premises/separate from a group on an outing.

5.3   The Head will speak to the parents to discuss events and give an account of the incident.

5.4   The Head will promise a full investigation (if appropriate involving Children's Services Services/ the City and Hackney Children Safeguarding Partnership ~~Board~~).

5.5 Media queries should be referred to the City of London Press Office.

5.6 The investigation should involve all concerned providing written statements.

5.7 The report should be detailed covering: time, place, numbers of staff and children, when the child was last seen, what appeared to have happened, [the purpose of the outing], the length of time that the child was missing and how she appeared to have gone missing, lessons for the future.

6. Procedures for dealing with unauthorised absence of frequent or prolonged absences which lack a satisfactory explanation

6.1 If parents request permission to take their children out of school for a purpose which does not accord with DFE regulations governing schools' ability to grant authorised leave of absence, such as a family holiday in term time, permission will be refused and parents will be warned that if they do take their child out of school, the absence will be recorded as unauthorised

6.2 If a child repeatedly takes unauthorised absence, or if the unauthorised absence is prolonged, the school will consult the ~~LADO?~~Education Welfare Consultant at the City of London Department of Community and Children's Services. ~~at City of London Children's Services~~ and may contact Children's Services and/or the attendance service in the child's home borough

6.3 The same procedure will be followed if the school considers that no satisfactory explanation of a child's absence has been received

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CITY OF LONDON SCHOOL FOR GIRLS

ANTI-BULLYING POLICY

Policy last reviewed by:	Susannah Gilham, Madeleine Garnham
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

1. Context

All schools have a duty to draw up procedures to prevent bullying and to bring these procedures to the attention of staff, parents and pupils under the School Standards and Framework Act 1998. The school's policy and procedures also take into account the guidance given in the DFE's Preventing and Tackling Bullying 2017 and Behaviour and Discipline in Schools 2016 and the guidance given in the ISSR handbook September 2017.

2. The School's Position

The school will not tolerate bullying. We believe that all students have the right to be educated in an environment where there is mutual respect and co-operation. Bullying is contrary to this approach and we do everything possible to discourage it.

We aim to create an environment in which bullying is minimised. If bullying does occur, we aim to ensure that the person being bullied is safe, we work to stop the bullying happening again and we provide support to the person being bullied. Parents, pupils teaching and support staff must be alert to signs of bullying and all members of the school community must report any bullying they experience or witness to the victim's Form Tutor or Head of Section.

Senior members of staff will always take reports of bullying seriously and will always ensure they are thoroughly investigated. Serious instances of bullying may be regarded as safeguarding issues and as such may be reported to the designated staff safeguarding leads and dealt with under the school's Safeguarding and Child Protection Policy. In some instances and where a criminal offence may have been committed it will be appropriate to liaise with the City of London Police.

3. Definitions of Bullying

Bullying is aggressive or insulting behaviour by an individual or group, often repeated over time, which hurts or harms another pupil or group physically or emotionally. It is often motivated by prejudice against particular groups for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability or because the child is adopted, is looked after by the Local Authority or is a carer. It may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email). Research confirms that bullying can have a lasting destructive effect on people's lives. Bullying can produce long lasting feelings of powerlessness, loss of self-esteem and isolation. Victims can sometimes become convinced that they are somehow at fault and can suffer serious long-term distress as a result. Their school work and social and emotional development can be seriously adversely affected. Bullying has the potential to cause serious psychological and physical damage and, in the most extreme cases, suicide.

4.   Aims and Objectives

The aim of the school Anti-Bullying Policy is to ensure that pupils learn in a supportive, caring and safe environment. The school's objectives are:

    4.1. To prevent bullying from happening by proactively teaching pupils about the harm it can do
    4.2. To promote appreciation of diversity
    4.3. To nurture students who are empathetic, respectful and considerate of others
    4.4. To respond appropriately and effectively to instances of bullying
    4.5. To ensure that parents, pupils and members of staff understand what bullying is and understand the school's policy on bullying and follow it, including by reporting any instances of bullying they come across
    4.6. To keep governors updated about serious instances of bullying and for governors to review the policy annually and to check on its effective implementation

5.   Examples of Bullying

NB this is not an exhaustive list but a summary of some common types of bullying behaviour:
- Calling someone names
- Threatening them
- Mocking their contributions in class
- Sending unpleasant texts or making threats or mocking someone on line (see section on cyberbullying at the end of this document)
- Saying or doing hurtful things to or about someone on the basis of their or their family member's actual or perceived sexual orientation (see section on homophobic bullying at the end of this document)
- Saying or doing hurtful things to or about someone on the basis of their, ethnic, social, cultural or religious background, a disability or special educational need, because they are in the care of the Local Authority or are acting as a carer, or because of an issue in their family
- Hitting, kicking, otherwise inflicting physical pain

6.   Relational Aggression

Relational aggression is described as behaviours that harm others through damage to relationships or feelings of acceptance, friendship or group inclusion (Crick and Grotpeter 1995). It refers to deliberate actions that intend to negatively affect an individual's friendships or reputation. Such actions, if ignored, can lead to social exclusion. The school takes relational aggression seriously and addresses the issues associated with it through our PSHCE and assembly programmes.

Examples include:
- Deliberately excluding someone
- Spreading rumours and gossip

- Breaking secrets
- Imitating or mocking a pupil
- Teasing or embarrassing a pupil

7.   Forms of bullying

The nature of bullying can be:

- Emotional – excluding, tormenting, threatening, hiding possessions
- Physical – pushing, punching, hair pulling, other violence
- Verbal – name-calling, sarcasm, spreading rumours, teasing, banter
- Cyber – misuse of the internet, social media, mobile phone and associated equipment

Bullying can be based on any of the following things:

- Race (racist bullying)
- Religion or beliefs
- Culture or class
- Gender (sexist bullying)
- Sexual orientation (homophobic or biphobic bullying)
- Gender identity (transphobic bullying)
- Special Education needs or disability
- Appearance or health conditions

8.   Signs that someone might be a victim of bullying

NB this is not an exhaustive list but a summary of some common indications that someone is being bullied. They could also be signs of other difficulties, but should give rise to investigating the possibility of bullying.

Parents and teachers should look out for a pupil:
- Seeming afraid of the journey to or from school, asking to be taken to school when they have previously been happy to walk or take public transport unaccompanied
- Making unexplained changes to their routine
- Trying to get out of going to school e.g. by claiming to be ill when nothing really seems wrong with them, playing truant
- Becoming anxious and withdrawn, appearing to have lost confidence
- Changes to behaviour such as stammering, easily becoming tearful, having a disturbed sleep pattern
- Possessions or clothes being frequently lost or damaged, asking for money without explaining why they need it
- Doing badly in school work
- Becoming aggressive towards siblings
- Unwilling to use mobile phone or computer or using them obsessively

- Unexplained cuts or bruises, self-harming, preoccupied by suicide

9. Preventing bullying

The school takes proactive measures to foster positive relationships and mutual respect through assemblies, PSHCE, peer support systems such as mentoring and form prefects, the school council and the system for recognising and awarding achievement. The school's programme of extracurricular activities enables pupils to achieve and to develop self-esteem and good relationships beyond the classroom. Opportunities to discuss and challenge bullying are provided in many subjects such as English and RPE, whilst assemblies, including special assemblies during National Anti-Bullying Week are also used to highlight the issues involved. The school also has a student-led Anti-Bullying Committee to help raise awareness of bullying and encourage pupils to form positive relationships with each other.

The school has a clearly defined pastoral system based around Form Tutors, Deputy Tutors, Assistant Heads of Section and Heads of Section. Pupils may seek support from the School Nurse and the School Counsellors. The House System fosters vertical integration allowing younger pupils to be supported by older students, and a Stonewall group provides support for those experiencing homophobic bullying.

Teachers receive training in dealing with bullying as part of the recurring cycle of CPD, parents are able to discuss bullying at Parents' Forum Events, at Parents' Breakfasts and at Parents' Evenings, whilst Governors annually review the school's anti bullying policy and scrutinise the school's records of serious bullying incidents. Resources relating to anti bullying are available in the school library. There is regular staff training to ensure that everyone is aware of the principles of the school policy, of action needed to resolve and prevent problems, of their legal responsibilities and of the support available to staff. Specialist training will be provided as needed to provide understanding of pupils with particular issues such as special educational needs or disabilities and LGBTQIA+ pupils.

10. Dealing with bullying

All members of the school community are encouraged to report any instances of bullying. "Third Party" reporting of bullying is positively encouraged so that those who are aware of bullying but are not victims of it come forward. Pupils will regularly be reminded about the part they can play to prevent bullying, including when they find themselves as bystanders.

Allegations of bullying must always be reported to the Head of Section or the Assistant Head of Section of the alleged victims and perpetrators, who will investigate the allegations, involving the Deputy Head (Pastoral) if necessary. Confidential notes of all allegations of bullying will be kept by Heads of Sections. Notes about serious cases of bullying will be kept on the files of victims and

perpetrators and a central record of serious incidents is kept by the Headmistress and reported to Governors.

If the investigation confirms that bullying has taken place, it will be made clear to the perpetrator that bullying will not be tolerated. The victim and perpetrator's parents will be informed and a suitable disciplinary sanction may be given. In serious cases, the Headmistress may temporarily or permanently exclude the perpetrator from school.

In less serious cases, mediation may take place which may include giving the victim the opportunity to tell the perpetrator about the effects of their bullying and which will give the perpetrator the opportunity to apologise for their behaviour, in accordance with the principles of restorative justice.

11.   Referral to External Agencies

When a child has experienced bullying which gives rise to reasonable concern that she is suffering, or it likely to suffer, significant harm this will be treated as child protection issue.. Advice will be sought from the LADO and if deemed appropriate a referral will be made to Children's Social Care with the consent of the child or her parents.

12. Bullying experienced by members of staff

The school recognises that adults can be the victims of bullying. Staff who experience bullying have recourse to the City of London's employee procedures including the Policy on Harassment and Bullying at Work and the staff Grievance Procedure.

13. LGBTQIA+ bullying

The school recognises that pupils who identify as being LGBTQIA+ or who are perceived as such may be subject to bullying. The school seeks to foster a culture of tolerance and acceptance of diversity and addresses issues of homophobia, biphobia and transphobia in PSHCE, in other subjects where appropriate and through assemblies. All members of the school community are reminded to use language that is respectful of and kind towards others, and to avoid language that perpetuates stereotypes or offends others. The school does not tolerate the use of derogatory language and its use will be challenged and recorded by staff.

The school has a long established Stonewall Youth Volunteering Group. Staff leaders of the group and some senior student members of it have received training by Stonewall. All teachers receive training on avoiding heteronormative lesson content where possible.

14. Cyberbullying

The school is committed to teaching pupils and parents about e-safety and the dangers of cyberbullying and online exploitation. These topics are covered for pupils in PSHCE and ICT

lessons and for parents in talks at pastoral evenings. Children are given age appropriate advice about the pitfalls of the internet, including the risk of online grooming.

The school has clear rules about the use of mobile phones and cameras in the pupil code of conduct. There is clarity about the school's use of photographs of pupils in promotional materials in the parental terms and conditions. Staff personal use of IT is covered in the staff code of conduct and is part of the regular cycle of safeguarding training. The school's computer system is filtered to prevent access to unsuitable sites, including social media sites. The school will act swiftly to block inappropriate sites if these are drawn to our attention. In a fast changing world continued vigilance by staff, parents and pupils is encouraged. The school's IT code of conduct is explicit about the unacceptability of teasing, mocking or threatening others online.

As with other forms of bullying, all members of the school community are encouraged to report any instances of cyberbullying.

15. Bullying which takes place off site and outside school time

Any reports of bullying of one member of the school community by another member will be treated in accordance with this policy, regardless of when and where the incident takes place.

16. Review and Evaluation

The Deputy Head Pastoral and the pastoral team keep the effectiveness of this policy and the prevalence of bullying in the school under ongoing review as part of their cycle of regular meetings. This process of review includes discussion of whether any patterns of bullying behaviour have emerged.
The policy and its effectiveness are reviewed annually by Governors.
The School Council regularly discusses anti bullying.

17. References

- Senior School Parents Handbook
- Prep Parents Handbook
- Pupil Code of Conduct
- ICT Code of Conduct
- School Policy on Pastoral Care, Discipline and Exclusions
- PSHCEE Policy
- Relationships and Sex Education Policy

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CITY OF LONDON SCHOOL FOR GIRLS

ADMISSIONS POLICY

Policy last reviewed by:	Janet Bonthron, Elly Nicoll, Emma Heseltine
Date policy last reviewed:	September 2020
Approved by:	
Date approved:	

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1. Statement

City of London School for Girls is a non-denominational, academically selective, independent day school for girls aged 7–18. Most girls are admitted to the City of London School for Girls ('the school') following annual assessments at 7+, 11+ or 16+. The 11+ assessments are held in the January prior to entry in the following September. The 7+ and 16+ assessments are held in November prior to entry in September the following year. Occasional places may be available at other ages. Admission is through an appropriate assessment exam and interview at the school.

While the school, as a non denominational institution, has a Christian ethos, we welcome staff and students from many different cultures, faiths and backgrounds and it is the intention of CLSG to make its selection procedure equally accessible to all candidates regardless of religion, ethnicity, disability or background. The school aims to provide a stretching, challenging academic education for girls at the top end of the ability range. The school also aims to provide a full and rounded education which helps to develop pupils morally, spiritually, socially and culturally, as well as intellectually. Finally, the school has a long tradition of religious, ethnic, neuro and social diversity within its pupil body, which it seeks to preserve as far as possible.

2. Aims

2.1   To identify and admit girls from all backgrounds who have met our academic standards and will benefit from an academic education at CLSG.

2.2   To admit girls who will contribute to and benefit from the ethos and opportunities available at City of London School for Girls.

2.3   To treat all candidates fairly and sensitively.

2.4   ~~Our policy is to apply these criteria to all pupils and potential pupils regardless of disability of which we are aware, subject to our obligation to make reasonable adjustments. At present, our physical facilities for the disabled are limited but we will do all that is reasonable to ensure that the School's culture, policies and procedures are made accessible to children who have disabilities and to comply with our legal and moral responsibilities under the Special Educational Needs and Disability Act 2001.~~
~~Replace 2.4 with:~~
Our policy is to apply these criteria to all applicants regardless of additional needs or disability. We recognise the importance of ensuring that the school's culture, policies and procedures are accessible to children who have SEND. We are committed to complying with our legal and moral responsibilities outlined in the SEN *Code of Practice* (2014) and the Equality Act (2010).

3. Procedures

3.1   Full details of entry procedures are published and updated annually in our Admissions booklets and on our website.

3.2   The closing dates for applications are published on the school website.

3.3   All families applying are encouraged to visit the school on an Open Day. Where an applicant has an additional need or disability pre-application contact with the SENCO is encouraged. All admissions are by competitive ~~examination~~ assessment and interview.

3.4   At 7+ the test consists of reading, spelling, reasoning, story writing and mathematics. Following the written tests selected potential entrants are also invited to take part in practical activities. We aim to recognise the child's potential for a successful academic career at the school. Except in a few instances in which there may be concerns about the progress of a pupil, girls are admitted to the Senior School without the need to sit the 11+ exam.

3.5   At 11+, CLSG seeks to select those girls who are most able to benefit from the education offered by the school. Candidates sit a computer-based test, assessing numerical, verbal and non-verbal skills. ~~Maths and an English paper.~~ Candidates who are successful in the ~~written exams~~ assessment will then be invited for interview.

Insert new point.

Parents/guardians wishing to apply for Access Arrangements should submit evidence when they register their daughter. The school follows JCQ guidelines. Access Arrangements will be offered where a history of need is supplied by the child's current school, supported by appropriate professional guidance. Access Arrangements will not be offered based solely on a professional report. The school reserves the right to offer alternative arrangements to those that the child receives in their current setting.

3.6.   At 11+, the school will set every year a pass mark above which every candidate will be interviewed and a mark below which no candidates will be interviewed. The marks will vary from year to year depending on the outcomes of the ~~exams~~ assessments. Between those two marks, there will be a pool of candidates out of which the school will select girls for interview based on the following criteria in order of preference:

1.   Girls who have been or are Looked After (definition as per section 22 of The Children's Act 1989)
2.   Girls currently enrolled in a state school and in receipt of Pupil Premium
3.   Girls currently enrolled in a state school
4.   Girls who have siblings currently at CLSG.

 If a girl falls under several of these categories, she will be considered under the highest ranking. Candidates within each category will be ranked by exam outcome.

The school will identify no less than 10 % and no more than 15% of the total number of candidates for interview from this pool.

We are committed to ensuring that students are not disadvantaged by the educational provision they received during lockdown between March-July 2020. We will be asking parents and schools to explain what education was offered each applicant and will be factoring this in when deciding who to invite back for interview. For this year, up to 50% of candidates invited back for interview may come from the 'grey area' described above.

3.7. At 11+ and 16+ Art, Drama, Sport and Music scholarships may also be awarded and means-tested bursaries are available to internal and external candidates. Full details of all scholarships and bursaries and how to apply for them are available on the website.

3.8 Offers of places and acceptances are made to a published timescale.

3.9 A waiting list is compiled. and parents are offered the opportunity to be considered for future vacancies a year after the initial assessment through the non-standard entry procedure.

3.10 The results of the assessments are not discussed with the parents or made public.

3.11 At 16+, external candidates for admission to the Sixth Form are required to sit entrance papers in the four subjects they propose to study at A level. Each paper lasts 45 minutes and is designed to test a candidate's potential. Where appropriate, JCQ or centre-approved Access Arrangements will be offered subject to receiving appropriate documentations from the applicant's current school. Following the written tests selected potential entrants are invited to attend for interview.

3.12 Means-tested Bursaries and Art, Drama and Music Scholarships are available to external and internal candidates at 11+ and 16+ entry. Sports scholarships are available at 11+. Full details are available on the website

3.123 The school offers support to girls of high intellectual ability who prove to have mild specific learning difficulties and also seeks to be as accessible as possible to those with serious medical conditions and physical disabilities.

3.134 The school is a fee-paying independent school, but seeks to be as accessible as possible to all able girls, regardless of their parents' ability to pay.

3.145 The school was committed to the Assisted Places Scheme before its withdrawal and has a long history of offering scholarships and bursaries to as many suitable applicants as possible.

3.156 Full details of scholarships and bursaries, available at 11+ and 16+ and how to apply for them are available in our Admissions booklets and on our website.

4. References

1. School Standard Terms and Conditions
2. City of London Corporation Equal Opportunities Policy
3. The Equality Act (2010)   2010 Equalities Act

4. The SEN Code of Practice (2014)
5. The Children's Act (1989)
6. 2014 SEND Policy

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