



## Board of Governors of the City of London Freemen's School

**Date:** MONDAY, 12 OCTOBER 2020  
**Time:** 11.00 am  
**Venue:** VIRTUAL MEETING - ACCESSIBLE REMOTELY

**Members:**

Deputy John Bennett	Alderman Robert Howard
Nicholas Bensted-Smith (Ex-Officio Member)	Michael Hudson
Deputy Roger Chadwick	Tim Levene (Ex-Officio Member)
Deputy Kevin Everett	Alderman Bronek Masojada
Nicholas Goddard	Graham Packham
Tracey Graham	Deputy Elizabeth Rogula
Andrew McMillan	Councillor Chris Townsend
Deputy Hugh Morris	Deputy Philip Woodhouse
Brian Harris	Gillian Yarrow

**Enquiries:** Polly Dunn  
[polly.dunn@cityoflondon.gov.uk](mailto:polly.dunn@cityoflondon.gov.uk)

### Accessing the virtual public meeting

Members of the public can observe this virtual public meeting via YouTube at the following link <https://youtu.be/4aPpmQAooQI>

### Meeting Recordings

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

**John Barradell**  
**Town Clerk and Chief Executive**

# **AGENDA**

## **Part 1 - Public Agenda**

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **ORDER OF THE COURT OF COMMON COUNCIL**  
To receive the Order of the Court of Common Council, dated 16 July 2020, appointing the Board and setting its terms of reference.  
  
**For Information**  
(Pages 1 - 2)
4. **ELECTION OF CHAIRMAN**  
To elect a Chairman in accordance with Standing Order No. 29.  
  
**For Decision**
5. **ELECTION OF DEPUTY CHAIRMAN**  
To elect a Deputy Chairman in accordance with Standing Order No. 30.  
  
**For Decision**
6. **MINUTES**  
To agree the public minutes and non-public summary of the meeting held on 3 June 2020.  
  
**For Decision**  
(Pages 3 - 6)
7. **PUBLIC OUTSTANDING ACTIONS**  
Report of the Town Clerk.  
  
**For Information**  
(Pages 7 - 10)
8. **APPOINTMENT OF SUB-COMMITTEES AND NAMED GOVERNORS**  
Report of the Town Clerk.  
  
**For Decision**  
(Pages 11 - 20)
9. **HEADMASTER'S PUBLIC REPORT**  
Report of the Headmaster.  
  
**For Information**  
(Pages 21 - 28)

10. **DEPUTY HEAD'S REPORT ON POLICIES**

Report of the Deputy Head.

**For Decision**  
(Pages 29 - 110)

11. **HEAD OF JUNIOR SCHOOL REPORT**

Report of the Head of the Junior School.

**For Information**  
(Pages 111 - 114)

12. **DRAFT ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2020 FOR THE CHARITIES ADMINISTERED IN CONNECTION WITH THE CITY OF LONDON FREEMEN'S SCHOOL**

Report of the Chamberlain.

**For Information**  
(Pages 115 - 140)

13. **DRAFT ANNUAL REPORT AND FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 MARCH 2020 FOR THE CITY OF LONDON FREEMEN'S SCHOOL BURSARY FUND**

Report of the Chamberlain.

**For Information**  
(Pages 141 - 166)

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

16. **EXCLUSION OF THE PUBLIC**

MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

**For Decision**

**Part 2 - Non-Public Agenda**

17. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 3 June 2020.

**For Decision**  
(Pages 167 - 172)

18. **NON-PUBLIC OUTSTANDING ACTIONS**

Report of the Town Clerk.

**For Information**  
(Pages 173 - 176)

19. **HEADMASTER'S NON-PUBLIC REPORT**  
Report of the Headmaster.
- For Information**  
(Pages 177 - 202)
20. **BURSAR'S REPORT**  
Report of the Bursar.
- For Information**  
(Pages 203 - 238)
21. **FINANCIAL INFORMATION DASHBOARD**  
Joint Report of the Chamberlain and the Bursar.
- For Information**  
(Pages 239 - 260)
22. **REVENUE OUTTURN REPORT 2019/20**  
Joint report of the Chamberlain and the Bursar.
- For Information**  
(Pages 261 - 270)
23. **WAIVER REPORT: SECURITY SERVICE PROVISION, CITY OF LONDON FREEMEN'S SCHOOL**  
Report of the Headmaster.
- For Decision**  
(Pages 271 - 276)
24. **HEADMASTER'S SAFEGUARDING REPORT**  
Report of the Headmaster.
- For Information**  
(Pages 277 - 280)
25. **GATEWAY 6: CITY OF LONDON FREEMEN'S SCHOOL SWIMMING POOL**  
Report of the City Surveyor.
- For Decision**  
(Pages 281 - 290)
26. **REPORT OF ACTION TAKEN BETWEEN MEETINGS**  
Report of the Town Clerk.
- For Information**  
(Pages 291 - 294)

- 27. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**
- 28. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

**Part 3 - Confidential Agenda - Circulated Separately**

- 29. **CONFIDENTIAL MINUTES**  
To agree the confidential minutes of the meeting held on 3 June 2020.

**For Decision**

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RUSSELL, Mayor	<b>RESOLVED:</b> That the Court of Common Council holden in the Guildhall of the City of London on Thursday 16 <sup>th</sup> July 2020, doth hereby appoint the following Committee until the first meeting of the Court in April, 2021.
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## **BOARD OF GOVERNORS OF THE CITY OF LONDON FREEMEN'S SCHOOL**

### 1. **Constitution**

A Non-Ward Committee consisting of,

- up to two Aldermen nominated by the Court of Aldermen
- up to 12 Commoners elected by the Court of Common Council at least one of whom shall have fewer than five years' service on the Court at the time of their appointment
- the following ex-officio Members:-
  - the Chairman of the Board of Governors of City of London School
  - the Chairman of the Board of Governors of City of London School for Girls
- up to six co-opted non-City of London Corporation Governors with skills relevant to the needs of the School.

The Chairman of the Board shall be elected from the City Corporation Members.

### 2. **Quorum**

The quorum consists of five Governors, of which not more than one of whom may be co-opted.

Any decision taken by the Board of Governors shall require the agreement of a majority of Common Council Governors present at the meeting and voting.

### 3. **Membership (until July 2021)**

#### ALDERMEN

- 1 Robert Picton Seymour Howard
- 2 Bronek Masojada

#### COMMONERS

- 17 (4) Roger Arthur Holden Chadwick, O.B.E., Deputy
- 8 (4) Hugh Fenton Morris, Deputy
- 2 (2) Tracey Graham *for three years*
- 12 (3) Elizabeth Rogula, Deputy
- 8 (3) Philip Woodhouse, Deputy
- 16 (2) John Alfred Bennett, M.B.E., Deputy
- 2 (2) Kevin Malcolm Everett, Deputy
- 12 (2) Michael Hudson
- 8 (1) Graham David Packham

*Vacancy*

*Vacancy*

*Vacancy*

together with :-

Nicholas Goddard

Brian Harris

Andrew McMillan

Chris Townsend

Lady Gillian Yarrow

*Vacancy*

together with the ex-officio Members referred to in paragraph 1 above.

### 4. **Terms of Reference**

To be responsible for:-

- (a) all School matters;

- (b) the management of the School land and buildings belonging to the City of London Corporation;
- (c) the appointment of the Headmaster/Headmistress and, where appropriate, the deputies and the bursar.



## **BOARD OF GOVERNORS OF THE CITY OF LONDON FREEMEN'S SCHOOL** **Wednesday, 3 June 2020**

Minutes of the meeting of the Board of Governors of the City of London Freeman's School held virtually. The meeting could be viewed at:  
<https://youtu.be/wq15S8mb1gM> on Wednesday, 3 June 2020 at 10.00 am

### **Present**

#### **Members:**

Deputy Philip Woodhouse (Chairman)  
Deputy Roger Chadwick (Deputy  
Chairman)  
Deputy John Bennett  
Nicholas Goddard  
Tracey Graham  
Michael Hudson  
Alderwoman Susan Langley

Alderman Bronek Masojada  
Andrew McMillan  
Deputy Hugh Morris  
Graham Packham  
Deputy Elizabeth Rogula  
Councillor Chris Townsend

#### **Officers:**

Alistair MacLellan  
Kerry Nicholls  
Rebecca Muscat  
Steven Reynolds  
Danielle Maalouf  
Bukola Soyombo  
Roland Martin  
Joanne Moore  
Stuart Bachelor  
Paul Bridges  
Matt Robinson  
Ola Obadara  
Noyon Choudhury

- Town Clerk's Department
- Town Clerk's Department
- Town Clerk's Department
- Chamberlain's Department
- Chamberlain's Department
- Chamberlain's Department
- Headmaster
- Bursar
- Deputy Head
- Deputy Head (Academic)
- Head of Junior School
- City Surveyor's Department
- City Surveyor's Department

### **1. APOLOGIES**

Apologies were received from Nick Bensted-Smith and Tim Levene.

### **2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations.

### **3. MINUTES**

**RESOLVED**, that the public minutes and non-public summary of the meeting held on 5 February 2020 be approved.

### **4. PUBLIC OUTSTANDING ACTIONS**

Governors considered a report of the Town Clerk regarding public outstanding actions. It was agreed that an action to develop guidance on appropriate starting salary for teaching staff should be added.

**RESOLVED**, that the report be received.

5. **HEADMASTER'S PUBLIC REPORT**

Governors considered the Headmaster's Public Report and the following points were made.

- The Headmaster praised School staff for their response to the challenges posed by the COVID-19 pandemic.
- Governors welcomed the news that the Design Technology Department had produced over 1400 protective visors, some of which were funded by the Freeman's School Association. Governors noted that institutions supported included Epsom Hospital, Princess Alice Hospice, Walton Heath Care Home, Homelea Care Home, The Meeting Room charity, and a number of others.
- In response to a question, the Headmaster confirmed he had held constructive meetings with the Common Room to discuss staff response to COVID-19.

**RESOLVED**, that the report be received.

6. **DEPUTY HEAD'S REPORT ON POLICIES**

Governors considered a report of the Deputy Head regarding Policies and the following points were made.

- In response to queries, the Deputy Head agreed to confirm any legal obligations to retain data for a minimum or maximum amount of time, e.g. whether it should be held for a period of more than one year. A Governor suggested that this issue was dealt with adequately in the existing IT Policy.
- Governors welcomed the tracked changes format that enabled them to identify exactly what changes were proposed.
- In response to a question, the Headmaster confirmed that existing policies and the School risk assessment had been reviewed and updated in light of COVID-19, rather than a specific COVID-19 policy being adopted.
- In response to a comment regarding a double choices in sciences and minimum class sizes, the Headmaster assured Governors that such decisions were education-led rather than business-led.

- In response to a question, the Deputy Head noted that the School was unable to confirm there were zero cases among the School community – indeed, there had been one confirmed case off-site.

**RESOLVED**, that Governors approve,

- The Complaints Policy
- The Curriculum Policy
- The Health and Safety Policy.

**7. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no questions.

**8. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**  
**Thanks to Brian Harris**

The Chairman and Headmaster both placed on record their thanks and appreciation for the long service of Brian Harris as Governor of City of London Freemen's School. Their sentiments were echoed by the Board.

**9. EXCLUSION OF THE PUBLIC**

**RESOLVED**, that under Section 100A(4) of the Local Government Act 1972 the public be excluded from the meeting for the following items of business on the grounds they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Act.

**10. NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 5 February 2020 be approved.

**11. NON-PUBLIC OUTSTANDING ACTIONS**

Governors considered a report of the Town Clerk regarding non-public outstanding actions.

**12. BURSAR'S REPORT**

Governors agreed to vary the order of items on the agenda so that the Bursar's Report was considered next.

**13. FINANCIAL INFORMATION DASHBOARD**

Governors agreed to vary the order of items on the agenda so that the joint report of the Chamberlain and Bursar on the Financial Information Dashboard was considered next.

**14. INVESTMENT OF CASH HELD BY THE CHARITIES ASSOCIATED WITH THE SCHOOL**

Governors agreed to vary the order of items on the agenda so that the joint report of the Chamberlain and Head regarding investment of cash held by charities associated with the School was considered next.

**15. HEADMASTER'S NON-PUBLIC REPORT**

Governors considered the Headmaster's non-public report.

At this point of the meeting, two hours having elapsed, Governors agreed to extend the meeting until all items on the agenda has been considered, in line with Standing Order 40 of the Court of Common Council.

16. **COVID-19 SCHOOL RETURN RISK ASSESSMENT**

Governors agreed to vary the order of items on the agenda so that the report of the Headmaster regarding the COVID-19 School Return Risk Assessment was considered next.

17. **DEPUTY HEAD'S NON-PUBLIC REPORT ON POLICIES**

Governors considered the Deputy Head's non-public report on policies.

18. **ANNUAL SAFEGUARDING REPORT**

Governors considered the Annual Safeguarding Report of the Headmaster.

19. **HEALTH AND SAFETY REPORT**

Governors considered a Health and Safety report of the Bursar.

20. **CITY SURVEYOR PROJECT BOARD REPORT**

Governors considered the City Surveyor's Project Board Report.

21. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no non-public questions.

22. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There was no other business.

23. **ANNUAL SAFEGUARDING REPORT - EXTRACT FROM NON-PUBLIC REPORT**

Governors considered confidential information provided in conjunction with Item 18 (Annual Safeguarding Report).

**The meeting ended at 12.30 pm**

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Chairman

**Contact Officer: Alistair MacLellan / [alistair.maclellan@cityoflondon.gov.uk](mailto:alistair.maclellan@cityoflondon.gov.uk)**

# Board of Governors of the City of London Freeman's School

## Outstanding Public Actions

Ref.	Date	Action	Officer responsible	Progress Update
1P/CLFS/2019	7 February 2019	Freemen's Estate Development Plan update to feature as a standing item on future Board agendas	Town Clerk	Ongoing
8P/CLFS/2019	25 September 2019	Worst-case BREXIT scenarios to form part of the 3-5 year strategic plan	Headmaster	Update due October 2020
14P/CLFS/2019	21 November 2019	The substantial number of volunteer hours committed by the School's pupils was discussed by the Board. Governors wished for the Award to be raised by the Headmaster at the forthcoming Heads' Forum and with the fellow heads of the City's Family of Schools.	Headmaster	Head to provide an update.
16P/CLFS/2019	13 January 2020 (FGPE)	Report to be submitted on the recommendations to, and actions taken by, the Freeman's School in response to the Corporation's Internal Audit processes	Bursar	TBC
17P/CLFS/2019	13 January 2020 (AP)	Town Clerk to gather availability of Governors to participate in classroom visits on Board (and Sub-Committee) meeting dates	Town Clerk	To be arranged after COVID-19 restrictions are lifted.
1P/CLFS/2020	5 February 2020	New date to be identified for the Governor Away Day	Town Clerk	To be arranged after COVID-19 restrictions are lifted.
2P/CLFS/2020	5 February 2020	The potential for the fund to which the School's development fund was direct to be a registered charity to be explored as part of the ongoing work to examine the City's charities.	Chamberlain	Ongoing.
3P/CLFS/2020	5 February 2020	Future iterations of the Community and Partnerships Report to detail whether the schools being collaborated with were from the state or independent sector.	Bursar	March 2021.

Ref.	Date	Action	Officer responsible	Progress Update
4P/CLFS/2020	3 June 2020	Guidance on appropriate starting salary for teachers to be developed	Headmaster/Bursar	Head to provide update.
5P/CLFS/2020	3 June 2020	Confirmation to be provided on any legal obligations over length of time data should be retained by the School	Deputy Head	Deputy Head to provide update.

# Board of Governors of the City of London Freemen's School

## Completed Actions

Ref.	Action	Progress Update
6P/CLFS/2019	Detailed risk assessments conducted by the City Surveyor's Department regarding fire safety, be submitted for information	Completed September 2019
7P/CLFS/2019	Better provision for virtual meetings be considered	Completed September 2019
9P/CLFS/2019	CLFS Prize Day invitations to governors to be sent by post and email	Completed - As a result of the COVID-19 pandemic, this event had been cancelled.
10P/CLFS/2019	Future iterations of the Junior School report to include an overview of academic progress and achievement	Completed.
11P/CLFS/2019	Possible rescheduling of 2020 Board and Sub Committee meeting dates	Completed
12P/CLFS/2019	Document containing dates of the Board, its sub committees and events such as Prize Day, to be circulated.	Completed – February 2020
13P/CLFS/2019	Report on the School's Fundraising and Development Activities (including projections)	Completed – February 2020
15P/CLFS/2019	A copy of the Learning and Innovation presentation to be circulated.	Completed
4P/CLFS/2020	Details of the Governors' City Visit to be circulated to Governors.	Completed (City Visit was subsequently cancelled)

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<b>Committee(s)</b> Board of Governors of the City of London Freemen's School	<b>Dated:</b> 12 October 2020
<b>Subject:</b> Appointment of Sub-Committees and Named Governors 2020/21	<b>Public</b>
<b>Report of:</b> Town Clerk	<b>For Decision</b>
<b>Report author:</b> Polly Dunn, Senior Committee and Member Services Officer, Town Clerk's Department	

## Summary

This report sets out, for approval, the composition and terms of reference of the Board of Governors' various sub-committees and requests that the Board give consideration to the appointment of Named Governors with responsibility for oversight of a specific aspect of School life.

This report also contains proposals for one new sub-committee.

## Recommendation(s)

That Members,

- Agree the terms of reference of the sub-committees of the Board;
- Confirm the membership of those sub-committees for 2020/21.
- Consider the appointment of Named Governors to portfolios.

## Main Report

Some general housekeeping has been exercised within the terms of reference at appendix 1, in an attempt to bring some uniformity of style and language to each of the Committees. Any additions are underlined and deletions have been struckthrough.

## Committees of the Board

### Bursary Sub-Committee

1. The Bursary Committee considers applications for 'Hardship Bursaries' to pupils where the parents fall into financial hardship and are unable to pay the school fees or where a pupil is unable to take up a place at the respective School because of financial hardship. These awards are funded from the charitable trust funds for the school and any awards made are reviewed on an annual basis (after three terms of assistance).
2. Meetings are called when an application for assistance is received.

3. Membership for 2019/20:

- Chairman of the Board
- Deputy Chairman of the Board
- Brian Harris
- Nicholas Goddard
- Andrew McMillan
- Chris Townsend

Finance, General Purposes and Estates Sub-Committee

4. This sub-committee was formed in June 2007. In October 2011, its membership was expanded from a total of five to six members as to avoid the sub-committee being inquorate.
5. The sub-committee has a monitoring role, identifying any financial problems before they became serious and recommending a course of action to the Board so that it may take any relevant decisions.
6. At the Board of Governors at the meeting of 7 February 2019 the Board agreed to delegate to its Sub Committee the power to approve non-statutory policies, as appropriate.
7. Currently the sub-committee meets once a term in sufficient time to report to the Board any matters that need agreement.

8. Membership for 2019/20:

- Nicholas Goddard (Chairman)
- Chairman of the Board
- Deputy Chairman of the Board
- Brian Harris
- Andrew McMillan
- Chris Townsend

Academic and Personnel Sub-Committee

9. The Academic and Education Sub-Committee was formed in June 2007. In October 2011, its membership was expanded from a total of five to six members as to avoid the sub-committee being inquorate.
10. The title of the sub-committee was changed to the Academic and Personnel Sub-Committee in September 2017, and its terms of reference adjusted to reflect its responsibility to monitor general safeguarding matters.
11. The Academic and Personnel Sub Committee has an important role in supporting the Head and senior management team, ensuring that important curricular and staffing issues are given appropriate discussion by Governors. To enable the Sub-

Committee to fulfil this role it is expected that Governors appointed to the Sub-Committee would, with the Headmaster's support, attend classes from time to time.

12. At the Board of Governors at the meeting of 7 February 2019 the Board agreed to delegate to its Sub-Committee the power to approve non-statutory policies, as appropriate.

13. The Sub-Committee meets once a term in sufficient time to report to the Board any matters that need agreement.

14. Membership for 2019/20:

- Andrew McMillan (Chairman)
- Chairman of the Board
- Deputy Chairman of the Board
- Nicholas Goddard
- Brian Harris
- Deputy Elizabeth Rogula
- Chris Townsend
- Lady Gillian Yarrow

### **Nominations Sub-Committee**

15. At its meeting of 13 January, the Academic & Personnel Sub-Committee briefly discussed the merits of the Board having some form of nominations sub-committee.

16. The role of a nominations sub-committee would be to take delegated responsibility on behalf of the Governing Body for conducting a regular skills audit of the Governing Body, identifying current or potential future gaps, seeking suitable applicants to fill those gaps, and coordinating the appointment process.

17. Appendix 1 provides a proposal for terms of reference.

18. It is expected that a Nominations Sub-Committee meet as required.

### **Teachers' Pay Panel**

19. In February 2015 the Boards of Governors of the City of London School, the City of London School for Girls and the City of London Freeman's School delegated to a Teachers' Pay Panel, consisting of the Chairmen of their Boards, the authority to consult and decide upon the annual teachers' pay award within agreed parameters from the Boards.

20. The Teachers' Pay Panel will consult with the Schools' Staff Side or Common Room representatives and an official from the National Education Union and Lecturers regarding the Teachers' pay submission.

21. The Teachers' Pay Panel may meet in March of each year. The Panel may decide to hold further meetings or conduct further communications via letter if necessary.

However, the aim will be to have made any decisions regarding pay by the end of the Spring term.

### **Named Governors**

22. The Board of Governors has to date appointed a Named Governor who is responsible for the oversight of a particular aspect of School life. Named Governors are expected to provide updates to the Board of Governors and perform certain duties for the School.

23. Town Clerk's records indicate current Named Governors are Andrew McMillan (Boarding) and Nick Goddard (Health and Safety) and Deputy Elizabeth Rogula (Safeguarding). Lady Gillian Yarrow acts in support of Deputy Rogula on the safeguarding portfolio of work.

### **Appendices**

- **Appendix 1** - Composition, Quorum and Terms of Reference of Sub-Committees

### **Polly Dunn**

Town Clerk's Department

E: [polly.dunn@cityoflondon.gov.uk](mailto:polly.dunn@cityoflondon.gov.uk) T: 020 7332 8726

(A) **Bursary Sub-Committee**

**Composition**

- Chairman and Deputy Chairman of the Board of Governors of the City of London Freemen's School
- The Chairman and Deputy Chairman of the Board shall act as Chairman and Deputy Chairman of the Sub-Committee
- Up to five other Governors appointed by the Board of Governors.

**Quorum**

The quorum shall be any three Governors.

The Sub-Committee shall report to each following Board of Governors meeting.

**Terms of Reference**

The Bursary Committee at their sole discretion after considering recommendations by the Headmaster of the School have power by a simple majority of those present and voting at a meeting of the Bursary Committee to apply the Fund for the advancement of public education by the following purposes:-

- (i) contributing towards the fees payable to the School on behalf of suitably qualified pupils who but for financial assistance having commenced education at the School would not be able to continue their education at the School;
- (ii) contributing towards the fees payable to the School on behalf of pupils of academic merit who but for financial assistance would not be able to obtain suitable education at the School;
- (iii) such other charitable purposes as shall be associated with the School as the Bursary Committee shall direct.

Provided always that no such bursary shall be made in respect of a pupil who is the issue of a parent of a member of the Board or of the spouse of such a member.

(B) **Finance, General Purposes and Estates Sub-Committee**

**Composition**

- The Chairman and Deputy Chairman of the Committee shall be selected from amongst its members with the agreement of the Full Governing Board.
- Chairman and Deputy Chairman of the Board of Governors of the City of London Freemen's School
- Up to four other Governors appointed by the Board of Governors (one of whom must be a Common Council Governor).
- ~~All Governors on the Board are eligible to serve, and any Governors serving on this sub-committee shall serve on the Academic and Personnel sub-committee.~~

**Quorum**

The quorum shall be any three Governors.

Any decision taken by the Sub-Committee shall require the agreement of a majority of Common Council Governors present at the meeting and voting.

The Sub-Committee should report to each following Board of Governors' meeting.

**Terms of Reference**

With power to act on the following matters:

- To agree action to be taken on arrears of fees;
- To approve non-statutory policies relevant to the wider remit of the Sub-Committee; and
- To co-opt any Governor of the Board or any appropriately qualified professional to give advice on specific matters

To make recommendations for the Board's approval on the following matters:

- the annual budget, scrutinised at the appropriate stage in the planning cycle and to monitor spending against the budget each term;
- the acceptance, or not, of the annual budget;
- any proposed Fee increases;
- consideration of any proposals for Major capital spending, as defined in the Capital Programme;
- the review of any investments and reserves held by the school;
- major developments (e.g. new buildings);
- compliance with health & safety requirements; and
- to make recommendations to the full Board on any other finance issues which may arise (e.g. a rise in employers' contribution to pensions, salary structure, etc).

(C) **Academic and Personnel Sub-Committee**

**Composition**

- The Chairman and Deputy Chairman of the Committee shall be selected from amongst its members with the agreement of the Full Governing Board.
- Chairman and Deputy Chairman of the Board of Governors of the City of London Freemen's School
- Up to ~~four~~ six other Governors appointed by the Board of Governors (one of whom must be a Common Council Governor).
- ~~All Governors on the Board are eligible to serve, and any Governors serving on this sub-committee shall serve on the Finance, General Purposes and Estates sub-committee.~~

**Quorum**

The quorum shall be any three Governors.

Any decision taken by the sub-committee shall require the agreement of a majority of Common Council Governors present at the meeting and voting.

The sub-committee should report to each following Board of Governors' meeting.

**Terms of Reference**

To make recommendations for the Board's approval on the following matters:

- to monitor general compliance with child protection requirements (not involving individual cases); and
- the development, monitoring and review of policies relating to educational provision to ensure compliance with legal or good practice requirements;
- curriculum and co-curricular issues;
- standards, including academic results;
- pastoral and ethos policy and practice;
- INSET and Professional Development policy and practice;
- staffing issues;
- to make recommendations on any other issues which have been referred by the full Board.

With power to act on the following matters:

- To agree requests for Sabbatical Leave;
- To approve non-statutory policies relevant to the wider remit of the Sub-Committee; and
- To co-opt any Governor of the Board or any appropriately qualified professional to give advice on specific matters.

## (D) **Nominations Sub-Committee**

### **Composition**

- The Chairman and Deputy Chairman of the Committee shall be selected from amongst its members with the agreement of the Full Governing Board.
- Chairman and Deputy Chairman of the Board of Governors of the City of London Freeman's School
- Up to four other Governors appointed by the Board of Governors (one of whom must be a Common Council Governor).

### **Quorum**

- The quorum shall be any three Governors.
- Any decision taken by the sub-committee shall require the agreement of a majority of Common Council Governors present at the meeting and voting.
- The sub-committee should report to each following Board of Governors' meeting.

### **Terms of Reference**

The Committee has the power to act on the following matters:

- The Committee will maintain and annually update a skills audit of the Governing Board, identifying and noting gaps;
- The Committee will seek to identify individuals able to serve as co-opted Governors;
- Such gaps as may occur should be used as guidance helping to assist in the selection of Common Council Governors.

To make recommendations for the Board's approval on the following matters:

- Having sought individuals to serve as co-opted Governors, the Committee will recommend these appointments to the Board for final approval;
- The Committee will make recommendations to the Board on designated governor roles;
- The Committee will provide recommendations on any other governance matters concerning the School, including scrutinising proposals for new committees and working parties.



## **Teachers Pay Panel**

### **Purpose of the Teachers' Pay Panel**

- The Boards of Governors of the City of London School, the City of London School for Girls and the City of London Freemen's School have delegated to a Teachers' Pay Panel, consisting of the Chairmen of their Boards, the authority to consult and decide upon the annual teachers' pay award within agreed parameters from the Boards.
- The Teachers' Pay Panel will consult with the Schools' Staff Side or Common Room representatives and an official from the National Education Union and Lecturers regarding the Teachers' pay submission.
- The Teachers' Pay Panel will usually meet in March of each year. The Panel may decide to hold further meetings or conduct further communications via letter if necessary. However the aim will be to have made any decisions regarding pay by the end of the Spring term.

### **Membership:**

The Chairmen of the Boards of Governors of the City of London School, the City of London School for Girls and the City of London Freemen's School. In their absence they may nominate a deputy from the membership of their Board of Governors.

One of the Chairmen of the Boards of Governors will act as the Chairman of the Teachers' Pay Panel on an annual rotation.

### **Quorum:**

The Quorum will be three and will consist of a Governor from each of the three Boards.

### **Consultation Process:**

During the process of deliberation, the Teachers' Pay Panel will meet with:

One representative from the Staff Side or Common Room of the City of London School, the City of London School for Girls and the City of London Freemen's School; and

The full time official from the National Education Union and Lecturers.

The following will be in attendance during deliberations in an advisory capacity:

- The Director of Human Resources
- The Heads of the City of London School, the City of London School for Girls and the City of London Freemen's School or in their absence their Deputy.

### **Remit of the Teachers' Pay Panel:**

To approve any pay award that will apply to the teachers' main grade and all teachers' management grades.

Any decisions around responsibility and other allowances or payments will be specified.

**Timing**

The timing of the process will be as follows:-

Financial information will be provided by the schools to the Staff Side and Common Room representatives in the autumn term of each year.

Any pay submission made by the Staff Side and Common Room will be made to a meeting of the Joint Consultative Committee in January/early February of each year.

Teachers' Pay Panel will usually meet in March.

Final decision to be made by the end of the Spring term if at all possible.

**Termination**

The Boards of Governors will review on an annual basis the continuation of the Teachers' Pay Panel.

# Agenda Item 9

<b>Committee(s)</b>	<b>Dated:</b>
The Board of Governors of the City of London Freemen's School	<b>12 October 2020</b>
<b>Subject:</b> Headmaster's Public Report	<b>Public</b>
<b>Report of:</b> Headmaster, City of London Freemen's School	<b>For INFORMATION</b>

## Summary

This report is for Members' information and 'the record' and includes:

- a) COVID-19
- b) Wider impact of BREXIT
- c) Community and Partnership work
- d) Educational Trips and Events
- e) Prize Day
- f) Wider landscape

Members are asked to consider the contents of this report and might like to pay particular notice to items for discussion.

## Main Report

### a) COVID-19

FOR INFORMATION:

1. Governors will imagine that it was a huge relief to welcome back children to School at the start of this term. I am pleased to say that pupil attendance was extremely high (including boarders: a few were in quarantine but only two have decided not to return this term so we started with 48) and staff have been positive and supportive regarding the return to work.
2. I am grateful to Governors for acknowledging the Risk Assessment that was circulated in advance of the school opening and must recognize the work of our Deputy Head, who has done much of the running on this document.
3. My 'COVID team' – that has been working closely with me from the upshot of school closure – has done commendable work throughout the lockdown period and during the summer holiday and I commend their commitment to the Board:
  - HR Manager
  - Deputy Head
  - Deputy Head Academic
  - Head of Boarding and Co-Curricular
  - Director of IT
  - Head of Operations
  - Bursar
  - Head of Junior School
  - Marketing and Communications Officer
4. The Health and Safety Executive (HSE) has informed schools through local Councils that they will be conducting checks regarding protocols in place

by telephone in the first instance. Because we need to pass tests at the moment...

**b) Wider impact of BREXIT**

FOR LIGHT RELIEF:

5. The Town Clerk has asked that Brexit and its impact be discussed at all Grand Committees.
6. I have nothing to report on this matter.

**c) Community and Partnership work**

FOR INFORMATION:

7. As you can imagine, 2020 has not been quite the year that we thought it would be for charitable fundraising. The Charity Co-ordinator started the year with a vision to raise £20,020 during the year and has done exceptionally well to encourage £14,156, raised since last September.
8. In addition, pupils have collected and donated a wide variety of items, including over 600kg of food for the Foodbank.
9. Not being able to hold RAG Week at the end of the Easter Term made a dent in the fundraising, but a very generous gift to Sightsavers by a Junior School parent (via the Edith Murphy Foundation) for his child's sponsored read was most gratefully received.
10. A spreadsheet of the 2020 campaign – which includes PPE production – is included as **Appendix 1**.
11. School stayed open for an additional two weeks at the end of the summer term for Key Worker children.
12. A group of pupils, led by a boy in Upper 5, baked and delivered over 1000 cakes to St George's Hospital, Epsom Hospital and local care homes.
13. The DT department produced safety screens for parents who work in medical settings, including a local dentist, GP surgery, NHS Child Development Clinic and CAMHS, plus a local charity - Sunnybank Trust.
14. Over 20 courses created by Heads of Department for our year 11 and year 13 students ('Preparation for A levels' and 'Preparation for University') were shared with all City of London schools in the summer term.

**d) Educational Trips and Events**

FOR INFORMATION:

15. As you will know, there has unfortunately not been the capacity to organise residential trips this summer and a good number of trips have been compromised by the pandemic.
16. Trips and visits planned for the period ahead are included as **Appendix 2**. It is likely that some of the events that Governors are used to supporting will be 'virtual' until further notice but I will keep them informed of opportunities to engage with the School. Although we are discouraging visitors from coming to School at the moment, Governors will always be welcome and their engagement with the School at this time will of course provide important inspection evidence.

**e) Prize Day**

FOR INFORMATION:

17. The School community very much missed the opportunity to celebrate Prize Day in Ashted Park this year and to have the opportunity to welcome The Lord Mayor's party, Governors, Members and Liverymen to join pupils and parents. Nevertheless, I am grateful that Prizes for pupils were distributed as usual and that the Lord Mayor and Chairman were able to join us for our first virtual event which brought an unusual term to its conclusion.
18. I have asked my EA to liaise with Mansion House to invite this year's Lord Mayor to Prize Day next summer which will – God willing - be on 9<sup>th</sup> July 2021.

**Appendices**

- **Appendix 1:** *2020 Vision Collections and Fundraising Totals*
- **Appendix 2:** *School Trips and Visits 2019-20.*

**Roland Martin**

Headmaster

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Tw: @RJMHM

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## 20/20 Vision

### Money raised during Autumn Term 2019

		£
20th Sept	Jeans for Genes Day	1063
27th Sept	McMillan Coffee Morning	512
14th Oct	Foodbank cash donations	50
11th Nov	British Legion Poppy Appeal	434
15th Nov	Children in Need (including raffle)	1171
December	Junior School Prefects' Fair	197.39
12th Dec	Christmas Jumpers Day	188
6th - 12th Dec	Carol Services donations	1027
<b>Autumn Term Total</b>		<b>4642</b>

### Money raised during Spring Term 2020

		£
15th Jan	Harrison's Fund (Christmas Fair)	1168
25th February	Shrove Tuesday Pancake Tea	205
13th March	Sport Relief	306
24th - 27th March	RAG Week Mufti Days	
25th - 27th March	RAG Week Events	
27th March	RAG Parade Concert	
<b>Spring Term Total</b>		<b>1679</b>

### Money raised during Summer Term 2020

		£
Rag and Roll on through May	Virtual Walk Land's End to John O'Groats for Challengers	430
	for Sight for Surrey	110
	for Sightsavers	50
	20 Challenges for Challengers	391
15th June - 4th July	Junior School Sponsored Read for Sightsavers *	1854
	* sponsorship money still coming in via Just Giving	
July	Grant to Sightsavers via Edith Murphy Foundation	5000
<b>Summer Term Current Total</b>		<b>7835</b>

### 20/20 Vision Total so far

**14156**

### Autumn Term Collections

October	Epsom and Ewell Foodbank	683 kg
November	Shoe Boxes	21
December	Bags of toiletries for The Hygiene Bank	24

### Spring Term Collections

January	Stamps for the RNIB	800g
February	Textbooks for Books2Africa	4 crates
March	Recycling unwanted glasses for Vision Aid Overseas	90 pairs
March	Lunches prepared by Upper 5 for local homeless people	24 meals

### Summer Term Collections

May	PPE equipment made for local NHS - face shields	1400
May	PPE equipment made for local NHS - ear protectors	500
May	PPE equipment made for local NHS - safety screens	12
May	Foodbank collection by Walbrook Boarding House	TBC
June	Cakes baked for local NHS hospitals, surgeries etc.	1200
June	Crisp packets for Kent, Surrey, Sussex Air Ambulance	TBC

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**TRIPS AND VISITS 2020-21**  
**(visits approved in principle; may still be postponed due to COVID-19)**

Name of Trip	Depart Date	Subject	Year Group	Number of Pupils Going	Total potential cost (exposure)	Notes
<b>2020 - 2021</b>						
<b>September</b>						
DofE Silver Practice Expedition	12 September 2020	DofE	U5	39	£0.00	
U4 PGL Trip	18 September 2020	U4 Team Building	U4	99	£6,930.00	
Bronze DofE Training Weekend	19 January 2020	DofE	L5	71	£0.00	
U5 Snowdonia Trip	22 September 2020	Geography	U5	52	£13,520.00	Cancelled due to COVID before being launched
<b>October</b>						
Geography A Level Trip to Barcelona - postponed due to COVID-19	09 October 2020	Geography and Spanish	L6	12	£9,060.00	Charged in full in July. Cancelled due to COVID,
U13 Jersey Sports Tour	21 October 2020	Games	L4	50	£31,500.00	Cancelled due to COVID before being launched
Senior Cricket Tour	19 October 2020	Boys Games	L5 - U6	26	£70,200.00	Cancelled due to COVID refund given in Summer
Senior Sports Tour	21 October 2020	Girls' Games	L5 - U6	approx. 28	£28,140.00	Cancelled
<b>November</b>						
<b>December</b>						
<b>January</b>						
<b>February</b>						
Art Trip to Paris	12 February 2021	Art	L6 - U6	9 to 12	£9,000.00	
<b>March</b>						
<b>April</b>						
America History / Politics Trip	04 April 2021	History / Politics	L6 - U6	30	£55,470.00	Cancelled due to COVID - refunds to be applied
<b>May</b>						
<b>June</b>						
<b>July</b>						
Borneo Expedition	Jul-21	Challenge	L5 - L6	approx 20	£71,000.00	
<b>August</b>						

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<b>Committee(s)</b>	<b>Dated:</b>
The Board of Governors of the City of London Freemen's School	12 October 2020
<b>Subject:</b> Deputy Head's Report on Policies	<b>Public</b>
<b>Report of:</b> Deputy Head, City of London Freemen's School	<b>For Decision</b>

## Summary

This report is for Governor engagement and decision.

- a) Background
- b) Recommendation

## Recommendation(s)

Members are asked to:

- Scrutinise the policies in this report;
- Ask questions of the Deputy Head and Headmaster surrounding these policies;
- Approve the policies presented.

## Main Report

### a) Background

1. Members will remember that they are responsible for the School's statutory policies and that oversight of them is an important part of their duties.
2. Policies in need of oversight at this meeting are:
  - *Appendix 1: Child Protection and Safeguarding Policy*
  - *Appendix 2: Anti-bullying Policy*
3. Governors will be aware of their statutory responsibility to review and approve the School's Safeguarding Policy at least annually. Amendments to the Policy can be found in track changes. The most significant additions are with respect to Mental Health, and for two reasons: one, at the February 2020 meeting, Governors enquired as to how the School reduced the risk of pupils succumbing to low mood, depression, anxiety and similar; two, the new (September 2020) version of *Keeping Children Safe in Education* requires schools to have clear processes for identifying possible mental health

problems, including routes to escalate and clear referral and accountability systems.

4. No major amendments have been made to the Anti-Bullying Policy. The increased emphasis on protected characteristics mirrors revised ISI guidance.
5. ISI guidance requires the School to maintain a record of incidents of bullying and alleged bullying, which is reviewed annually by Governors. Anonymised excerpts for 2019-20, together with a commentary, can be found in the Headmaster's Non-public Report.

## **b) Recommendation**

FOR DECISION

6. It is recommended that Governors approve policies included as appendices in this report.

## **Appendices**

- *Appendix 1: Child Protection and Safeguarding Policy*
- *Appendix 2: Anti-bullying Policy*

**Stuart Bachelor**  
Deputy Head

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# Child Protection and Safeguarding Policy

for both the Junior and Senior School

for COVID-19 Addendum, click [here](#)

Issue number	4.8
Name and appointment of owner / author	Stuart Bachelor, Deputy Head and Designated Safeguarding Lead
Review Body	SLT and Full Board of Governors
Last updated	1 <sup>st</sup> September, 2020
Reason for update	new version of KCSIE; full re-opening of school site
Last reviewed by SLT	August 2020
Last reviewed by Governors	25 <sup>th</sup> September, 2019
Next SLT review due	July 2021
Next Governor review due	September 2020
Where available	Staff Handbook, School web-site (unrestricted area)

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**Commented [SB1]:** new nomenclature in KCSIE 2020 in recognition of non-violent forms of abuse

## Safeguarding Statement

City of London Freeman's School recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils, which is defined as follows:

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

Therefore, we:

- make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.
- are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice
- are always guided by the imperative to act in the best interests of the child

and always to act in the best interests of the child. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the School's wider safeguarding responsibilities.

**Commented [SB2]:** amended to reflect updated KCSIE definition of safeguarding and updated Surrey template Policy.

### Key Personnel and Contact Details

#### Designated Safeguarding Lead (DSL)

Mr. Stuart Bachelor (Deputy Head)  
[stuart.bachelor@freemens.org](mailto:stuart.bachelor@freemens.org)  
01372 822434

#### Deputy Designated Safeguarding Leads (DDSLs)

Mr. Matt Robinson (Head of Junior School)  
[matt.robinson@freemens.org](mailto:matt.robinson@freemens.org)  
01372 822465

~~Mr. Richard Dolan (Head of Sixth Form)~~  
~~[richard.dolan@freemens.org](mailto:richard.dolan@freemens.org)~~  
~~01372 822486~~

Ms Sophie Blair (Head of Upper School- Maternity Leave)  
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01372 822484

Mrs. Justine Marvin (Head of Lower Sixth (Year 12))  
[justine.marvin@freemens.org](mailto:justine.marvin@freemens.org)  
01372 822478



Mrs. Jemima Edney (Head of Boarding)  
[jemima.edney@freemens.org](mailto:jemima.edney@freemens.org)  
01372 822460

Mrs. Janet Wilby-King (Head of Form 1 (Year 3))  
[janet.wilby@freemens.org](mailto:janet.wilby@freemens.org)  
01372 822482

~~Mrs. Tracey Clarke (Sports Administrator)~~  
~~[tracey.clarke@freemens.org](mailto:tracey.clarke@freemens.org)~~  
~~01372 822419~~

~~Mr. Robbie Davies (Acting Head of Upper School)~~  
~~[robert.davies@freemens.org](mailto:robert.davies@freemens.org)~~  
~~01372 822484~~

Mrs. Kate Barron (School Nurse Manager)  
[kate.barron@freemens.org](mailto:kate.barron@freemens.org)  
01372 822451

#### Chairman of Governors

Deputy Philip Woodhouse  
c/o Guildhall, London, EC2P 2EJ  
[philip.woodhouse@cityoflondon.gov.uk](mailto:philip.woodhouse@cityoflondon.gov.uk)

#### Safeguarding Governor

Miss Elizabeth Rogula  
c/o Guildhall, London, EC2P 2EJ  
[elizabeth.rogula@cityoflondon.gov.uk](mailto:elizabeth.rogula@cityoflondon.gov.uk)

#### Deputy Safeguarding Governor

Lady Yarrow  
[gillian.yarrow@cityoflondon.gov.uk](mailto:gillian.yarrow@cityoflondon.gov.uk)

#### Headmaster

Roland Martin  
[roland.martin@cityoflondon.gov.uk](mailto:roland.martin@cityoflondon.gov.uk)  
01372 822426

Our local safeguarding partnership is Surrey Safeguarding Children Partnership

Surrey Local Authority Designated Officer (LADO) - 0300 123 1650

Surrey County Council Children's Single Point of Access (C-SPA)  
0300 470 9100 (Mon.-Fri. 0900-1700) [csplash@surreycc.gov.uk](mailto:csplash@surreycc.gov.uk)

Surrey County Council Emergency Duty team (out of hours) - 01483 517898

Surrey Schools Child Protection Consultation Line – 0300 470 9100 (Mon.-Fri. 0900-1700)

NSPCC Whistleblowing Helpline - 0800 028 0285

Local Children's Services (South East Surrey) - 0300 123 1620

Any issues surrounding Female Genital Mutilation – Contact Police on 101

City of London safeguarding contact person:

Chris Pelham  
Assistant Director People  
Department of Community & Children's Services  
City of London  
PO Box 270  
Guildhall, London  
EC2P 2EJ  
E: [chris.pelham@cityoflondon.gov.uk](mailto:chris.pelham@cityoflondon.gov.uk)  
T: 020 7332 1636 (Switchboard is 020 7303 6060)

## 1. Policy Statement

- 1.1. The Board of Governors takes seriously its responsibility under section 175/157 of the Education Act 2002 to: safeguard and promote the welfare of children; work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children who are suffering harm, **be it physical or mental**. Accordingly, a member of the Board (currently Miss Elizabeth Rogula) is appointed as Safeguarding Governor to take leadership responsibility for the organisation's safeguarding arrangements. A Deputy Safeguarding Governor (currently Lady Yarrow) deputises in her absence.
- 1.2. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and the Education Act 2002. It has regard to (i.e. complies with):
  - **Keeping Children Safe in Education (September 2020) (KCSIE)**
  - Non-statutory interim supplement to KCSIE: **Safeguarding and remote education during coronavirus (COVID-19)**
  - KCSIE incorporates the additional statutory guidance, **Disqualification under the Childcare Act 2006 (September 2018)**
  - KCSIE also refers to the non-statutory advice for practitioners: **What to do if you're worried a child is being abused (March 2015)**
  - KCSIE refers also to **When to call the police**, non-statutory guidance from the National Police Chiefs' Council
  - **Working Together to Safeguard Children (September 2018 – updated in 2019 but without changing the date on the published version) (WT)**
  - WT refers to the non-statutory but important advice: **Information sharing (2018)**
  - **Prevent Duty Guidance: for England and Wales (July 2015) (Prevent)**. Prevent is supplemented by non-statutory advice and a briefing note:
  - **The Prevent duty: Departmental advice for schools and childminders (June 2015)**
  - **The use of social media for on-line radicalisation (July 2015)**
- 1.3. This Policy is in line with Surrey Safeguarding Children Partnership's procedures, which can be found at <https://surreyscb.procedures.org.uk/>
- 1.4. It is based on SSCP's model safeguarding policy but has been adapted to reflect local procedures.
- 1.5. This Policy is made available to parents of pupils and parents of prospective pupils on an unrestricted part of the School's web-site and is provided, on request and free of charge, in paper format via post or in electronic format via e-mail. A hard copy can be inspected at the School's Gatehouse, and hard copies are also available from Junior and Senior School Receptions.
- 1.6. This policy is amended as soon as any part of it becomes out of date. Amendments are made by Stuart Bachelor (Deputy Head and Designated Safeguarding Lead). Any changes to the policy are reviewed by the Headmaster and discussed in an SLT meeting.
- 1.7. This policy is reviewed at least annually by the Board of Governors or as events or changes to legislation require.
- 1.8. This Policy should be read in conjunction with the following documents / guidance / policies, all of which are available on request and free of charge from the Deputy Head's office:

Anti-bullying

**Commented [SB3]:** This list updated to reflect addition of sets of guidance and updating of existing guidance.

Admissions  
 Attendance  
 Behaviour  
 Boarding  
 Boarding A-Z (pupil's guide)  
 Boarding Staff Handbook  
 Contractors on School Premises  
 Curriculum  
 Disclosure and Barring Service  
 Drugs and Drug Testing  
 First Aid  
 Guardianship  
 Health & Safety  
 Missing Child- Boarders  
 Missing Child- Day Pupils  
 Online Safety  
 Physical Restraint of Pupils  
 PSHE schemes of work  
[Relationships and Sex Education](#)  
 Recruitment and Selection Policy (City of London Corporation)  
 Reporting Safeguarding Concerns  
 Risk Assessment Guide  
 Risk Policy  
 Safer Recruitment Checklist - Schools  
 Searches and Confiscation Policy  
 Staff Code of Conduct (Appendix 9 of this Policy)  
 Teaching and Learning  
 Whistleblowing

1.9. Safeguarding issues specific to boarding include: overnight stays; unaccompanied free time; guardianship arrangements; increased opportunity for use of the School's internet facility; potential for using Virtual Private Networks in order to circumvent the School's filtering and monitoring systems; maintaining personal privacy from staff and other boarders; security during night hours. These are addressed in the following supporting documents: Guardianship Policy; Boarding Policy; Boarding Staff Handbook; A-Z of Boarding; Missing Child (Boarders).

1.10. This policy applies to all members of our school community, including boarders.

## 2. Policy Principles

- 2.1. The welfare of the child is paramount.
- 2.2. All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- 2.3. We recognise that all adults, including temporary staff<sup>1</sup>, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- 2.4. All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- 2.5. Young people should feel safe, secure, valued and respected. They should also feel confident to, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.
- 2.6. Pupils and staff involved in child protection issues will receive appropriate support.

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<sup>1</sup> "staff" covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc. and governors

### 3. Policy Aims

- 3.1. To demonstrate the School's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- 3.2. To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 3.3. To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
- 3.4. To emphasise the need for good levels of communication between all members of staff.
- 3.5. To develop a structured procedure within the School which will be followed by all members of the school community in cases of suspected abuse.
- 3.6. To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 3.7. Clarifying procedures to ensure that all staff working within our School who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)<sup>2</sup>, and that a single central record is kept for audit.
- 3.8. We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

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<sup>2</sup> <https://www.gov.uk/government/collections/dbs-checking-service-guidance-2>

## 4. Values

### 4.1. Supporting Children

- 4.1.1. 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.
- 4.1.2. 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.
- 4.1.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.1.4. The School supports all children by:
  - 4.1.4.1. encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying;
  - 4.1.4.2. promoting a caring, safe and positive environment within the school;
  - 4.1.4.3. responding sympathetically to any requests for time out to deal with distress and anxiety;
  - 4.1.4.4. offering details of helplines, counselling or other avenues of external support such as [www.kooth.com](http://www.kooth.com) and ChildLine;
  - 4.1.4.5. liaising and working together with all other support services and those agencies involved in the safeguarding of children;
  - 4.1.4.6. notifying social care as soon as there is a significant concern;
  - 4.1.4.7. providing a coordinated offer of early help when additional needs of children are identified and contributing to early help arrangements and inter-agency working and plans;
  - 4.1.4.8. providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring that the school medical records are forwarded as a matter of priority. This is ensured by the Admissions Officer notifying the DSL of any leavers (other than those leaving for university who have turned 18). The DSL then liaises with the Medical Centre.

- 4.1.5. Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education programme and through all aspects of school life. This includes online safety.
- 4.1.6. We help pupils to use the internet safely by filtering unsuitable websites and monitoring usage. A daily Smoothwall categorised report (including a category for radicalisation) of attempts by pupils to access unsuitable sites is sent to the DSL, Head of Boarding and Heads of Section (all of whom are DDSLs). If any of those colleagues have concerns, they share them with the DSL and agree what action, if any, to take.

#### 4.2. Prevention / Protection

- 4.2.1. We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

##### 4.2.2. We therefore:

- 4.2.2.1. work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to; e.g. by marking national Time to Talk Day with stands in the Junior and Senior Schools, which has the aim of reducing the stigma surrounding mental health;
- 4.2.2.2. promote Wellbeing and thus seek to prevent the low mood / depression / anxiety that can develop into suicidal ideation, self-harm, eating disorders and children becoming a risk to themselves, including by the following measures:
  - compulsory Wellbeing Module in KS4 Enrichment
  - School Counsellor available three days a week
  - nurse-led Medical Centre with mental ill health suite
  - ~12 staff and ~20 pupils every year trained in Mental Health First Aid by certified provider
  - 6 CPL seminars on pastoral themes per year
  - Advertisement of online counselling services (e.g. Kooth)
  - developing an 'Assessment for Wellbeing' approach for academic assessment to reduce counter-productive pressure and anxiety
  - use of Suicidal Thoughts Disclosure risk assessments as standard procedure
  - 'Time to Talk' Day marked each February with stands in JS and SS promoting positive mental health
  - High-performance stress management workshops for KS4 pupils and parents by outside speaker
  - eating disorders covered in U4 PSHE; healthy eating and positive body image also promoted in PSHE
  - eating disorders covered in safeguarding slot in January 2018
  - self-harm covered in safeguarding slot in Staff Briefing January 2019
  - non-judgemental approach by staff towards self-harm and eating disorders



- 4.2.2.3. initiate and act upon regular consultation with children e.g. L5 presenting an Assembly in November 2017 on homophobic bullying; training and empowering U5 wellbeing prefects; our pupil-led Equality Society;
- 4.2.2.4. ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty. For example: posters advertising the school counsellor are displayed around the school; in the Upper School, it is advertised that a senior pastoral of staff can always be found in a specified location 1.15-.145 p.m. every day; the DSL speaks to all Senior School pupils at the beginning of the year about who the Safeguarding Team is and that their contact details can be found on posters around the school; regular mentions in Junior School Assemblies about whom to approach if help is needed;
- 4.2.2.5. include safeguarding in PSHE. In particular this will include anti-bullying work, online-safety, road safety, pedestrian and cycle training, with a view to preparing pupils for more independent travel as they get older;
- 4.2.2.6. give L6 Junior School prefects a dedicated safeguarding training session run by a DDSL (Richard Dolan, Head of Sixth Form);
- 4.2.2.7. ensure that all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## 5. Safe Staff, Safe School

### 5.1. Safeguarding Training and raising awareness

5.1.1. The DSL liaises with Nataalka Eaglestone (who is responsible for the teacher induction programme) and Helen Lambert to ensure that all new colleagues receive safeguarding induction training. This training covers:

- our Child Protection and Safeguarding Policy;
- our Behaviour Policy for pupils;
- our Staff Code of Conduct, including whistleblowing and acceptable use of IT;
- the identity and role of the Designated Safeguarding Lead and DDSLs;
- online safety;
- the School's safeguarding response to children who go missing from education;
- managing a report of peer-on-peer sexual violence / harassment

This training is delivered by the DSL or, if necessary, a DDSL.

5.1.1.1. All new staff are provided with electronic copies of:

- *Keeping Children Safe in Education* Part 1 and (for SLT and those who work directly with children) Annex A;
- our *Child Protection and Safeguarding Policy*;
- the in-house guidance *Reporting Safeguarding Concerns*
- our policy on Pupils Missing Education (which is contained within our *Child Protection and Safeguarding Policy*)
- our *Staff Code of Conduct* (appended to our *Child Protection and Safeguarding Policy*);
- our *Whistleblowing Policy*;
- City of London's *Acceptable Use of IT Policy*

which they then read and sign to declare that they have done so.

5.1.2. All staff receive regularly up-dated safeguarding and child protection training in line with advice from Surrey Safeguarding Children's Partnership. At Freeman's, this takes three forms, namely:

- 5.1.2.1. frequent, punchy up-dates at Staff Briefings, Non-teaching Staff Safeguarding Briefings and via e-mail;
- 5.1.2.2. annual safeguarding training in September, which will focus in more depth on an aspect of safeguarding as well as reminding staff of local safeguarding procedures and maintaining their understanding of the signs of abuse;
- 5.1.2.3. *Working Together to Safeguard Children* e-learning (full course or refresher course as appropriate) through the Surrey Skills Academy, which is endorsed by SSCB. Staff take the refresher course at least every three years and are prompted to do so by the Deputy Head's Secretary.
- 5.1.3. All Governors have regular child protection awareness training, updated by the DSL as appropriate.
- 5.1.4. Whenever *Keeping Children Safe in Education* is up-dated, staff receive a copy and sign to say that they have read and understood Part 1 and (for SLT and those who work directly with children) Annex A.
- 5.1.5. Members of the Board of Governors receive a copy of *Keeping Children Safe in Education* 2020 and sign to declare that they have read and understood Part 2.
- 5.1.6. Volunteers and coaches not directly employed by the School receive a face-to-face safeguarding briefing from the Designated Safeguarding Lead so that they are familiar with local procedures.

- 5.1.7. An accurate record is kept of who has received what safeguarding training and when that training was completed.
- 5.1.8. The names and photographs of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are clearly advertised in the School via posters in classrooms, staff rooms and corridors.
- 5.1.9. The regular contractor staff whom we have on site (currently catering and gatehouse staff employed by Sodexo) know the identity of the DSL and their duty to report any concerns directly to him.

## 5.2. Hiring of premises

- 5.2.1. We are vigilant regarding the suitability of adults working with children on school sites as a result of the School's premises being let out.
- 5.2.2. CLFS has, by intention, very few term-time lets, and currently the only ones involving children are for use of the swimming pool. The following control measures feature in our risk assessment for safeguarding our pupils:
  - For term-time lets, we insist upon a written assurance that all adults supervising children are DBS-checked.
  - For term-time lets with no children involved, the activity leader is required to have a DBS
  - All lessees are given a copy of our safeguarding policy
  - The Head of Boarding is aware of the times and locations of term-time lets
  - Boarders do not use the sports facilities at the same time as lessees
  - Our Gatehouse, which is manned by security staff around the clock, is aware of when any lessees are on the premises and steps up patrols accordingly
  - We have CCTV covering much of the school grounds
- 5.2.3. Our written agreements with all lessees include a requirement to assure us that all adults supervising children are DBS-checked and that we are in receipt of their safeguarding policy. These policies are passed to the DSL for examination.
- 5.2.4. The Bursar is made aware of the identity of lessees. If she has any concerns regarding a lessee in respect of Prevent, she shares them with the DSL. Written agreements with lessees include a clause requiring them to disclose at least two weeks in advance the names of visiting speakers. This information is passed to the Bursar, who approaches the DSL if she has any concerns.
- 5.2.5. Liaison with lessees, the Bursar, the Head of Boarding and the DSL in respect of the above is the responsibility of Suzanne Wilding, Lettings Assistant.

## 5.3. Visitors and Contractors

- 5.3.1. Visitors to the School are signed in at Reception, given a yellow lanyard to wear and accompanied at all times. Staff challenge unaccompanied visitors.
- 5.3.2. The School has a separate document *Procedures for Contractors on School Premises*, which has been written with regard to Surrey's *Guidance on contractors working in education settings* (September 2019). Among other things it covers: the need for a sponsor who takes responsibility for co-ordinating the visit of a particular contractor; DBS requirements; signing-in/out procedures; when contractors must and need not be supervised; contact with children; a Code of Conduct that must be consented to by all contractors. Contractors who need not be supervised wear a blue lanyard.

**Commented [SB4]:** This paragraph has been re-written in light of a separate set of procedures having been created.

## 5.4. Internet filtering and monitoring

- 5.4.1. Staff usage of the School's internet is filtered by Smoothwall and a categorised report created of any activity that might be of concern.
- 5.4.2. This report is seen only by Stuart Bachelor, DSL, and ~~Richard Dolan~~ Matt Robinson, DDSL. Concerns are followed up by the DSL, who informs the Headmaster if necessary. If the report gives cause for concern regarding the DSL, ~~Richard Dolan~~ Matt Robinson informs the Headmaster directly.



## 6. Roles and Responsibilities

### 6.1. All members of The Governing Body understand and fulfil their responsibilities, namely to ensure that:

- 6.1.1. there is a Child Protection and Safeguarding policy together with a Staff Code of Conduct;
- 6.1.2. child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff code of conduct, are consistent with Surrey Safeguarding Children Partnership and statutory requirements, are reviewed annually and that the Child Protection policy is publicly available on the School website;
- 6.1.3. all staff including temporary staff and volunteers are provided with the School's child protection policy and staff code of conduct;
- 6.1.4. all staff have read Keeping Children Safe in Education (2020~~19~~) part 1 and (in the case of SLT and those who work directly with children) Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance;
- 6.1.5. the School follows the City of London's *Recruitment and Selection Policy, Safer Recruitment Checklist and Disclosure and Barring Service Policy*, which include statutory checks on staff suitability to work with children and disqualification by association regulations;
- 6.1.6. Senior Leadership Team members undergo safer recruitment training at regular intervals to ensure that at least one member of every selection panel has completed the training within the last five years; the Headmaster and HR Manager are qualified to deliver this training and last did so to the whole of SLT in January 2020.
- 6.1.7. the School has procedures for dealing with allegations of abuse against staff (including the Headmaster), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had he or she not resigned;
- 6.1.8. a member of the Governing Body is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headmaster.
- 6.1.9. a member of the Senior Leadership Team has been appointed as the DSL by the Governing Body who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description;
- 6.1.10. on appointment, the DSL and DDSLs undertake interagency training (SSCB Foundation Modules 1&2) and also undertake DSL 'New to Role' and 'Update' training every two years;
- 6.1.11. all other staff have safeguarding training updated as appropriate;
- 6.1.12. at least one member of the governing body has completed safer recruitment training, to be repeated every five years;
- 6.1.13. children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE);
- 6.1.14. appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future;
- 6.1.15. appropriate online filtering and monitoring systems are in place;
- 6.1.16. enhanced DBS checks (without barred list checks, unless the Governor is also a volunteer at the School) are in place for all Governors;
- 6.1.17. any weaknesses in Child Protection are remedied immediately.

### 6.2. The Headmaster ensures that:

- 6.2.1. The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff;
- 6.2.2. sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and DDSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;

- 6.2.3. where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- 6.2.4. systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart;
- 6.2.5. all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures;
- 6.2.6. that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- 6.2.7. the responsibilities of the DSL and DDSs are stated explicitly in their respective job descriptions;
- 6.2.8. he liaises with the Local Authority Designated Officer (LADO) before taking any action on an ongoing basis, where an allegation is made against a member of staff or volunteer;
- 6.2.9. anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

### 6.3. The Designated Safeguarding Lead:

- 6.3.1. holds ultimate responsibility for safeguarding and child protection in the School;
- 6.3.2. has overall responsibility for online safety in the School;
- 6.3.3. acts as a source of support and expertise in carrying out safeguarding duties for the whole school community;
- 6.3.4. encourages a culture of listening to children and taking account of their wishes and feelings;
- 6.3.5. is appropriately trained with updates every two years and will refresh his knowledge and skills at regular intervals but at least annually;
- 6.3.6. refers a child if there are concerns about possible abuse, to the Surrey Children's Single Point of Access (C-SPA)<sup>3</sup>, and act as a focal point for staff to discuss concerns. Referrals are made in writing, following a telephone call, using the Request For Support Form<sup>4</sup>. If unsure as to whether or not to make a referral or to seek advice about which services would best benefit a child, the DSL rings the Surrey Schools Child Protection Consultation Line.<sup>5</sup>
- 6.3.7. keeps detailed, accurate written records of all concerns about a child even if there is no need to make an immediate referral;
- 6.3.8. ensures that all such records are kept confidential, stored securely and are separate from pupil records, until the child's 25<sup>th</sup> birthday;
- 6.3.9. ensures that an indication of the existence of the additional file in 6.3.8 above is marked on the pupil records;
- 6.3.10. ensures that, when a pupil leaves the school, his/her child protection file is passed to the new school (separately from the main pupil and ensuring secure transit) and that confirmation of receipt is obtained and kept for 6 years;
- 6.3.11. ensures that a copy of the CP file is retained until such a time that the new school acknowledges receipt of the original file, following which the copy is shredded;
- 6.3.12. in addition to sending any CP file, is proactive in sharing other relevant information about the child with his/her new school's DSL so that the best support can be put in place at the earliest juncture;
- 6.3.13. if we need to keep a copy of the CP records even though the child has transferred to another school, e.g. because legal proceedings are pending, a short Retention Policy is written giving the reasons why such records are retained;
- 6.3.14. liaises with the Admissions Department to the end that the latter send out letters to the schools of pupils joining Freeman's asking them to send any CP records or else declare that no such records exist;

<sup>3</sup> All new referrals go to the [Surrey Children's Single Point of Access \(C-SPA\)](#) on 0300 470 9100 operating 9.00am to 5.00pm. In an emergency out of hours, referrals can be made to the Emergency Duty Team on 01483 517898.

<sup>4</sup> Online forms can be downloaded from the [SSCB website](#).

<sup>5</sup> [Surrey Schools Child Protection Consultation Line](#): 0300 470 9100 operating 9.00am to 5.00pm

- 6.3.15. receives any CP records for new joiners and shares this information on a 'need to know' basis, including with SEN staff if appropriate, so that the best support is in place for when they begin at the School;
- 6.3.16. liaises with the Local Authority and works with other agencies and professionals in line with *Working Together to Safeguard Children*;
- 6.3.17. has a working knowledge of SSCB procedures;
- 6.3.18. ensures that either he, or a DDSL, attend case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report where required which has been shared with the parents;
- 6.3.19. ensures that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to his/her key worker's Social Care Team;
- 6.3.20. ensures that all staff sign to say they have read, understood and agree to work within the School's Child Protection Policy, Staff Code of Conduct and *Keeping Children Safe in Education* 2019 Part 1 and (for SLT and those members of staff who work directly with children) Annex A, and ensures that the policies are used appropriately;
- 6.3.21. organises child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keeps a record of attendance and addresses any absences;
- 6.3.22. contributes to and provides, with the Headmaster and Chair of Governors, the *Audit of Statutory Duties and Associated Responsibilities* to be submitted annually to the education safeguarding team at Surrey County Council;
- 6.3.23. completes the safeguarding audit as required at regular intervals by the City of London;
- 6.3.24. has an understanding of locally agreed processes for providing early help and intervention and supports members of staff where early help is appropriate;
- 6.3.25. organises the monitoring of the school's online filters and co-ordinates the following up of any concerns that are raised as a result;
- 6.3.26. keeps the Headmaster informed of all safeguarding matters;
- 6.3.27. attends all Board of Governors meetings, giving a concise, verbal and anonymised update of safeguarding developments at every meeting, together with a full, written report at the June meeting;
- 6.3.28. ensures that the name of the DSL and DDSLS are clearly advertised in the school;
- 6.3.29. convenes, chairs and arranges for circulation of agenda/minutes of half-termly safeguarding team meetings;
- 6.3.30. nominates a DDSL to stand in for him if he is absent from school during school hours and communicates this arrangement to all staff in advance.

**6.4. The Deputy Designated Safeguarding Leads:**

- 6.4.1. together with the DSL form the School's Safeguarding Team (see 6.5 below);
- 6.4.2. are deliberately drawn from different parts of the School, and include both SLT and non-SLT colleagues;
- 6.4.3. are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the Headmaster nominates a DDSL to assume all of the functions above.
- 6.4.4. commit to refreshing their knowledge and current awareness of safeguarding issues, including Prevent and Channel.
- 6.4.5. under the direction of the DSL, take responsibility for devising and delivering portions of safeguarding training to staff and pupils.
- 6.4.6. are frequently called upon by the DSL to provide a "second opinion" when deciding how best to act in a safeguarding situation;
- 6.4.7. are sometimes nominated by the DSL to act as lead person in respect of a pupil who presents concerns that fall short of the Referral threshold.

**6.5. The Safeguarding Team:**

- 6.5.1. consists of the DSL and DDSLS;
- 6.5.2. is a collegiate body where: all voices are heard and equally welcomed; opinions are given weight according to how well-argued they are, not according to who is making them; 'group-think' is actively discouraged;
- 6.5.3. reflects our belief that safeguarding in a school should not be dealt with solely by one or two colleagues. Members of the Team know that they can and should hold one another to account;
- 6.5.4. meets formally once every half-term to discuss how safeguarding in the School could be improved and to impart a working knowledge to all members of what the "live" safeguarding issues are in the School (whilst having due regard for the principle of "need to know"). Agenda and Minutes are distributed by the DSL;
- 6.5.5. has members who are committed to doing everything that they can within their areas of the School to promote a 'culture of safeguarding' in the School.



#### 6.6. All School Staff:

- 6.6.1. understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action;
- 6.6.2. consider, at all times, what is in the best interests of the child;
- 6.6.3. know how to respond to a pupil who discloses abuse through delivery of *Working Together To Safeguard Children* (2018), and *What To Do If You Are Worried A Child Is Being Abused* (2015);
- 6.6.4. in line with the in-house guidance *Reporting Safeguarding Concerns*, refer any safeguarding or child protection concerns to the DSL or, if necessary where the child is at immediate risk, to the Police or children's social care;
- 6.6.5. refer any concerns about the behaviour of a member of a staff to the Headmaster or, if those concerns are about the Headmaster, to the Chair of Governors;
- 6.6.6. are aware of the Early Help<sup>6</sup> process and understand their role within it including identifying emerging problems for children who may benefit from an offer of early help, liaising with the DSL in the first instance and supporting other agencies and professionals in an early help assessment through information sharing. In some cases staff may act as the lead professional in Early Help cases;
- 6.6.7. diligently record attendance of pupils in registration and monitor attendance in lessons and other activities;
- 6.6.8. follow our *Missing Child- Day Pupils* and *Missing Child- Boarders* procedures
- 6.6.9. provide a safe environment in which children can learn.

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<sup>6</sup> Detailed information on early help can be found in Chapter 1 of [Working together to safeguard children](#)

## 7. Confidentiality

- 7.1. City of London Freeman's School recognises that in order to effectively meet a child's needs, safeguard his/her welfare and protect him/her from harm, the School must contribute to inter-agency working in line with *Working Together to Safeguard Children* (2018) and share information between professionals and agencies where there are concerns.
- 7.2. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 is not a barrier to sharing information where the failure to do so would place a child at risk of harm.
- 7.3. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 7.4. However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headmaster, DSL and DDSs will only disclose information about a child to other members of staff on a 'need to know' basis.
- 7.5. We undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we consult with an Assistant Team Manager at the Children's Services Area Team on this point.

## 8. Child Protection Procedures

- 8.1. Abuse and neglect are forms 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 the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.
- 8.2. Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in Appendix 1.
- 8.3. Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".
- 8.4. There are also a number of specific safeguarding concerns that we recognise our pupils may experience:
  - 8.4.1. Child missing from education (see para 20)
  - 8.4.2. Child missing from home or care
  - 8.4.3. Child sexual exploitation (CSE) (see para 13 and appendix 3)
  - 8.4.4. Bullying including cyberbullying (see para 10)
  - 8.4.5. Domestic abuse (see para 12 and appendix 5)
  - 8.4.6. Drugs
  - 8.4.7. Fabricated or induced illness
  - 8.4.8. Faith abuse
  - 8.4.9. Female genital mutilation (FGM) (see para 15 and appendix 4)
  - 8.4.10. Forced marriage (see para 16)
  - 8.4.11. Gangs and youth violence
  - 8.4.12. Gender-based violence/violence against women and girls (VAWG)
  - 8.4.13. Mental health
  - 8.4.14. Private fostering
  - 8.4.15. Radicalisation (see para 11 and appendix 6)
  - 8.4.16. Youth produced sexual imagery (sexting) (see para 24)
  - 8.4.17. Teenage relationship abuse (see para 24)
  - 8.4.18. Trafficking
  - 8.4.19. Peer on peer abuse (see para 22)
- 8.5. Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and youth produced sexual imagery (sexting) put children in danger and that safeguarding issues can manifest themselves via peer on peer abuse.
- 8.6. We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

#### 8.7. If staff are concerned about a child's welfare

- 8.7.1. Full procedures are set out in the document *Reporting Safeguarding Concerns*, which is given to all new staff at induction and can be found in the Staff Handbook.
- 8.7.2. If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue, they contact the DSL (or DDSL if he can't be contacted) immediately. They then record these concerns immediately on a Safeguarding Concern Form (which can be found on the Desktop) and pass it to the DSL.
- 8.7.3. There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed. Freeman's recognise that the signs may be owing due to a variety of factors, such as a parent having moved out, a pet having died, a grandparent is being very ill or an accident having occurred. However, they may also indicate a child is being abused or is in need of safeguarding.
- 8.7.4. In these circumstances staff give the child the opportunity to talk. Typically the first response will be to ask the pupil if he/she is OK and if the member of staff can help in any way.
- 8.7.5. Staff should use the Safeguarding Concern Form, which can be found on every PC desktop, to record these early concerns and give the completed form to the DSL.
- 8.7.6. If the pupil does begin to reveal that he/she is being harmed, staff should follow the advice below regarding a pupil making a disclosure.

#### 8.8. If a pupil discloses to a member of staff

- 8.8.1. Full procedures are set out in the document *Reporting Safeguarding Concerns*, which is given to all new staff at induction and can be found in the Staff Handbook.
- 8.8.2. We recognise that it takes a lot of courage for a child to disclose that he/she is being abused. (S)he may feel ashamed, guilty or scared, his/her abuser may have threatened that something will happen if he/she tells, (s)he may have lost all trust in adults or believe that what has happened is his/her fault. Sometimes (s)he may not be aware that what is happening is abuse.
- 8.8.3. A child who makes a disclosure may have to tell his/her story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that his/her first experience of talking to a trusted adult is a positive one.
- 8.8.4. During their conversation with the pupil, staff:
  - 8.8.4.1. listen to what the child has to say and allow him/her to speak freely;
  - 8.8.4.2. remain calm and not overact or act shocked or disgusted – the pupil may stop talking if he/she feels that (s)he is upsetting the listener;
  - 8.8.4.3. reassure the child that it is not his/her fault and that (s)he has done the right thing in telling someone;
  - 8.8.4.4. are not afraid of silences – staff must remember how difficult it is for the pupil and allow him/her time to talk;
  - 8.8.4.5. take seriously what the child is disclosing;
  - 8.8.4.6. ask open questions and avoid asking leading questions;
  - 8.8.4.7. avoid speculation, jumping to conclusions or making accusations;
  - 8.8.4.8. do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused;

- 8.8.4.9. do not admonish the child for not disclosing sooner. Saying things such as "I do wish you had told me about it when it started" may be interpreted by the child to mean (s)he has done something wrong;
- 8.8.4.10. tell the child what will happen next.

- 8.8.5. If a pupil talks to any member of staff about any risks to his/her safety or wellbeing, the staff member will let the child know that he/she has to pass the information on because staff are not allowed to keep secrets.
- 8.8.6. The member of staff writes up his/her conversation on the Safeguarding Concern Form (which can be found on the Desktop) in the child's own words as soon as possible and by the end of the same day at the latest. The record is signed, timed and dated, the member of staff's name is printed and it details where the disclosure was made and who else was present. The record is then handed to the DSL.

#### 8.9. Notifying Parents

- 8.9.1. The School normally seeks to discuss any concerns, suspicions or disclosures about a pupil with his/her parents. These are handled sensitively. However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.
- 8.9.2. Where there are concerns about forced marriage or honour-based ~~violence~~ abuse, parents are not informed that a referral is being made, as to do so may place the child at a significantly increased risk.

#### 8.10. Making a referral

- 8.10.1. Concerns about a child or a disclosure should be discussed with the DSL, who will help decide whether a referral to children's social care, Early Help or other support is appropriate in accordance with the levels of need detailed in Surrey's Effective Family Resilience document<sup>7</sup>.
- 8.10.2. If a referral is needed then the DSL should make it. However, anyone can make a referral and, if for any reason a staff member thinks a referral is appropriate and one hasn't been made, (s)he can and should consider making a referral himself/herself.
- 8.10.3. Any such referral is made to the local authority in which the child resides.
- 8.10.4. The child (subject to his/her age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- 8.10.5. If after a referral the child's situation does not appear to be improving, the DSL (or the person who made the referral) will press for re-consideration to ensure that their concerns have been addressed and the child's situation improves.
- 8.10.6. If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.
- 8.10.7. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

#### 8.11. Supporting Staff

- 8.11.1. 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.
- 8.11.2. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate. In such circumstances, staff can talk to the School Counsellor.

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<sup>7</sup> <https://www.surreyscb.org.uk/wp-content/uploads/2018/12/Effective-family-resilience-SSCB-Final-March-2019-1.pdf>

## 9. Children who are particularly vulnerable

- 9.1. City of London Freeman's School recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.
- 9.2. We understand that this increase in risk is owing more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.
- 9.3. In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that he/she is experiencing it.
- 9.4. Some children may also find it harder to disclose abuse owing to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.
- 9.5. To ensure that all our pupils receive equal protection, we give special consideration to children who are
  - 9.5.1. Disabled or have special educational needs
  - 9.5.2. Young carers
  - 9.5.3. Affected by parental substance misuse, domestic abuse or parental mental health needs
  - 9.5.4. Asylum seekers
  - 9.5.5. Living away from home
  - 9.5.6. Vulnerable to being bullied or engaged in bullying
  - 9.5.7. Already viewed as a 'problem'
  - 9.5.8. Living in temporary accommodation
  - 9.5.9. Live transient lifestyles
  - 9.5.10. Living in chaotic and unsupportive home situations
  - 9.5.11. Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
  - 9.5.12. At risk of sexual exploitation
  - 9.5.13. Do not have English as a first language
  - 9.5.14. At risk of female genital mutilation
  - 9.5.15. At risk of forced marriage
  - 9.5.16. At risk of being drawn into extremism.

## 10. Mental Health

- 10.1. City of London Freeman's School recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. When a child appears to have a mental health problem, we try to ascertain the under-lying reasons for it rather than just seeking to address the symptoms.
- 10.2. If a member of staff believes that a pupil's mental health amounts to a safeguarding concern- i.e. that it means that the pupil is at risk of significant harm- he/she follows normal safeguarding procedures (i.e. reports those concerns to the DSL immediately). We recognise that, as a result of a severe mental health difficulty, a child can be at risk of significant harm to himself/herself through suicide or self-harm.
- 10.3. We are aware that children with mental health problems can be 'borderline' safeguarding concerns and therefore need to be monitored by the Safeguarding Team.

10.4. Irrespective of any mental health problem giving rise to a safeguarding concern, the School is committed to helping pupils to achieve the best possible mental health- i.e. wellbeing.

10.5. Staff know that a mental health problem can manifest itself in many ways, including:

- anxiety, including about academic performance;
- listlessness / apathy / inability to engage with academic work;
- lateness to school / poor attendance / school refusal;
- low mood / feelings of numbness;
- suicidal ideation / suicide attempts;
- poor relationship with food / eating disorders;
- insomnia / poor sleep patterns;
- low self-esteem / self-confidence;
- concerns about body image;
- craving affirmation and acceptance / apparent willingness to be taken advantage of by others;
- anti-social behaviour / unkind behaviour towards others;
- self-harm;
- obsessive behaviour;
- sudden changes in behaviour.

10.6. If a member of staff is concerned that a pupil may have a mental health problem that does not amount to a safeguarding concern, he/she contacts the pupil's Form Tutor and Head of Year as soon as possible, who will investigate further.

10.7. Freeman's staff never seek to make a mental health diagnosis. Rather, we help pupils and parents to access the right professional support, usually via the pupil's GP in the first instance. Sometimes we may deem it appropriate, with the consent of the pupil and parents, to make a direct referral to CAMHS (Child and Adolescent Mental Health Services).

10.8. The School Counsellor, who works at the School 3 days per week, can give confidential<sup>8</sup> support to pupils, and we encourage pupils and parents to take up this offer.

10.9. As with all pupils with difficulties of a pastoral nature, a pupil with a mental health problem is entered on to the Pastoral Tracking Spreadsheet. The level at which he/she is helped (Form Tutor, Head of Year or Head of Section) will depend on how serious the problem is deemed to be. Information is then shared on a need-to-know basis, with a pastoral alert added to the pupil's MIS page so that staff are aware and know to ask the Head of Year if they need more information.

10.10. The School is proactive in fostering a culture that is positive about mental health and free of stigmas around disclosing that one has a mental health problem. We also invest in continuing professional learning to ensure that the right help is on hand if a pupil or member of staff disclosed a mental health problem. To this end, we:

- participate every February in 'Time to Change Day', an initiative designed to reduce the stigma of mental health, by setting up stands in the Senior and Junior Schools;
- have re-purposed a room in the Medical Centre as a wellbeing suite for pupils who present with problems that are psychological rather than physical in nature;
- have over 40 staff trained in Mental Health First Aid by an accredited trainer; train around 12 Sixth-Formers in MHFA every year;
- have a peer mentoring scheme for Sixth-Formers to support Upper School pupils;
- use events such as U4 GCSE Options Evening to speak to parents about how they can support their children by encouragement and setting high standards while avoiding creating counter-productive pressure and low self-esteem;
- run parental seminars on topics such as mental health, anxiety and exam stress;
- annually invite a team from 'The Great Man Project' to discuss with L5 boys male mental health and the challenges faced by young men in the modern world;
- concurrently, girls attend workshops focusing on resilience and how it could be applied to real-life situations;
- invite an external speaker to talk to the U5 about managing stress and performing under pressure;

<sup>8</sup> subject to the usual imperative to share information where the child is judged to be at risk of harm



- have a dedicated space run by specially-trained U5 pupils for Junior School pupils- 'The Haven'- where they can discuss any problems (including mental health problems) that they may have;
- advertise online counselling services and sources of support such as Kooth and NSPCC
- use Staff Briefings to raise awareness and understanding of mental health (recent topics have included eating disorders and self-harm);
- raise awareness among teaching staff of how modelling a 'growth mindset', especially around assessment, can boost self-esteem-;
- cover mental health extensively in PSHE;
- have a staff Wellbeing Committee that meets termly;
- have a pupil Wellbeing Committee run by Sixth-Formers
- conduct annual Wellbeing surveys for staff and pupils
- have a Wellbeing Week every May during which we run a series of activities and workshops for staff and pupils.

#### **40-11. Anti-Bullying/Cyberbullying**

40-1-11.1. Our policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may amount to a dereliction of our statutory safeguarding duties. This includes all forms e.g. cyber, racist, homophobic and gender-related bullying. We keep a record of known bullying incidents, which is shared with and discussed by the governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

40-2-11.2. When there is "reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm", a bullying incident should be addressed as a child protection concern under the category of peer-on-peer abuse (see paragraph 23 below). If the anti-bullying procedures are seen to be ineffective, the Headmaster and the DSL will also consider implementing child protection procedures.

40-3-11.3. The subject of bullying is addressed at regular intervals in PSHE education.

## **11.12. Radicalisation and Extremism**

11.1.12.1. The Prevent Duty for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

11.2.12.2. Extremism is defined 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, whether in this country or overseas.

11.3.12.3. Some children are at risk of being radicalised- that is, of adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

11.4.12.4. City of London Freeman's School regards any exploitation of vulnerable children and radicalisation as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism<sup>9</sup>.

11.5.12.5. City of London Freeman's School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Northern Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

11.6.12.6. School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.

11.7.12.7. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the School follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)<sup>10</sup>. From time to time, Assemblies focus on Fundamental British Values.

11.8.12.8. The Governing Body, the Headmaster and the DSL assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include the use of School premises by external agencies, anti-bullying policy and other issues specific to the School's profile, community and philosophy.

11.9.12.9. Staff who wish to invite a speaker to the School fill in a Visiting Speaker Form and send to the Deputy Head at least a week beforehand. The Deputy Head assesses any risk and acts accordingly

11.10.12.10. The School has met with Surrey's Prevent Officer to receive up-dates and advice regarding the Government's Prevent Strategy.

11.11.12.11. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, he/she speaks to the DSL. If the DSL judges that the threshold for a referral is met, he and the colleague complete a Prevent Referral Form together (see <https://www.surreyscb.org.uk/resources-category/radicalisationandexploitation-prevent/>) and send it to [preventreferrals@surrey.pnn/police.uk](mailto:preventreferrals@surrey.pnn/police.uk). If the matter is urgent, Surrey Police are contacted by dialling 999.

<sup>9</sup> <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

<sup>10</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)



## **12.13. Domestic Abuse**

12.1.13.1. Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

12.2.13.2. We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

12.3.13.3. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

12.4.13.4. Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 5).

12.5.13.5. City of London Freeman's School is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools. Every school day morning our key adult (Stuart Bachelor, DSL) / deputy key adult (Matt Robinson, Head of Junior School, DDSL) is notified of all domestic abuse incidents that have occurred in the previous 24 hours which involved a pupil at this school (72 hours on a Monday morning). This allows us to provide the right support at the right time for our pupils who are experiencing domestic abuse.

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

**13.1-14.1.** Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

**13.2-14.2.** Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. City of London Freeman's School is aware there is a clear link between regular school absence/truancy and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truancy and make reasonable enquiries with the child and parents to assess this risk.

**13.3-14.3.** The DSL uses the Surrey Safeguarding Children's Partnership CSE Screening Tool<sup>11</sup> on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

**13.4-14.4.** In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact Surrey C-SPA and email the completed CSE Screening Tool along with a Request For Support Form. If a child is in immediate danger the police should be called on 999.

**13.5-14.5.** City of London Freeman's School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

**13.6-14.6.** City of London Freeman's School includes the risks of sexual exploitation in the PHSE curriculum. Pupils are informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

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<sup>11</sup> <http://www.surreyscb.org.uk/wp-content/uploads/2016/06/SSCB-CSE-Screening-Tool-May-16.pdf>

## **14.15. Female Genital Mutilation (FGM)**

14.1.15.1. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police<sup>12</sup>.

14.2.15.2. The duty applies to all persons in City of London Freeman's School who are employed or engaged to carry out 'teaching work' in the School, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, although the DSL should be informed.

14.3.15.3. If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher personally makes a report to the police force in which the girl resides by calling 101 by the close of the next working day.

14.4.15.4. School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty are reported as per the School's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of possible risk to other girls in the family and practising community.

14.5.15.5. Where there is a risk to life or likelihood of serious immediate harm, the teacher reports the case immediately to the police, including dialling 999 if appropriate.

14.6.15.6. There are no circumstances in which a teacher or other member of staff should examine a girl.

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<sup>12</sup> <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

## **15.16. Forced Marriage**

**15.1.16.1.** A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

**15.2.16.2.** Forced marriage 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. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

**15.3.16.3.** A forced marriage is not the same as an arranged marriage, which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

**15.4.16.4.** School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit 200 7008 0151.

## **16.17. Honour-based ~~Violence~~Abuse**

~~16.1.17.1.~~ Honour based ~~violence abuse~~ (~~HBVHBA~~) 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 can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

~~16.2.17.2.~~ Honour based ~~violence abuse~~ might be committed against people who:

~~16.2.1.17.2.1.~~ become involved with a boyfriend or girlfriend from a different culture or religion;

~~16.2.2.17.2.2.~~ want to get out of an arranged marriage;

~~16.2.3.17.2.3.~~ want to get out of a forced marriage;

~~16.2.4.17.2.4.~~ wear clothes or take part in activities that might not be considered traditional within a particular culture.

~~16.3.17.3.~~ It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.



#### **17.18. One Chance Rule**

17.1.18.1. All staff are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance to speak to a pupil who is a potential victim and have just one chance to save a life.

17.2.18.2. City of London Freeman's School is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

## **18.19. Private Fostering Arrangements**

**18.1.19.1.** A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

**18.2.19.2.** Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

**18.3.19.3.** City of London Freeman's School recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

**18.4.19.4.** By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify Surrey Children's Social Care of the circumstances.

## **19.20. Looked After Children**

19.1.20.1. The most common reason for children becoming looked after is as a result of abuse and neglect. City of London Freeman's School ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

19.2.20.2. The DSL has details of the social workers of any looked after pupils, together with the name and contact details of the Surrey County Council's virtual school head for children in care.

19.3.20.3. The DSL works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the School and meet the needs in the child's personal education plan.

## **20.21. Children Missing Education**

**20.1-21.1.** Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

**20.2-21.2.** The DSL monitors unauthorised absences and take appropriate action, including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with *Children Missing Education: Statutory Guidance for Local Authorities*<sup>13</sup> and *Surrey County Council Safeguarding Children Missing Education Policy 2017*<sup>14</sup>.

**20.3-21.3.** Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

**20.4-21.4.** In order that missing pupils can be located as quickly as possible, the School requests more than one emergency contact number for parents of new pupils and that the numbers provided are contacts for at least two separate persons (usually the two parents). The Admissions Department follows up this request if it is not initially met. If a parent requests that an emergency contact is deleted, staff are vigilant in requesting an alternative number so that the above minimum level is maintained.

**20.5-21.5.** Further details about how we identify and act in response to missing pupils can be found in our *Attendance Policy* and *Missing Child Procedures*.

**20.6-21.6.** Details of how the School flags pupils leaving Freeman's in order to ensure that they continue to be in full-time education can be found in our *Admissions Policy*.

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<sup>13</sup> <https://www.gov.uk/government/publications/children-missing-education>

<sup>14</sup> [https://www.surreycc.gov.uk/\\_data/assets/pdf\\_file/0005/109589/Final-CME-Policy-2017-ver-2-updated-nov17.pdf](https://www.surreycc.gov.uk/_data/assets/pdf_file/0005/109589/Final-CME-Policy-2017-ver-2-updated-nov17.pdf)

## **21.22. Online Safety**

21.1.22.1. Our pupils increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat and Oovoo and for online gaming.

21.2.22.2. Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

21.3.22.3. Overall responsibility for online safety in the School lies with the Designated Safeguarding Lead.

21.4.22.4. City of London Freeman's School has an established procedure for responding to online safety incidents (See flowchart, Appendix 7).

21.5.22.5. Freeman's is mindful of its responsibility under *KCSIE* to consider carefully how to manage 3G and 4G accessibility via pupil mobile 'phones whilst on its premises. Following a successful trial in Summer Term 2019, Freeman's has introduced rules that restrict the use of mobile 'phones and other internet-enabled devices. Pupils from F1 to U5 (Year 3 to Year 11) may only use them during the day with staff permission.

21.6.22.6. Pupils are taught about online safety throughout the curriculum and all staff receive online safety training, which is regularly updated

21.7.22.7. The School has a separate *Online Safety Policy*, which details measures for safe use of the School's internet by pupils, including the use of filters and monitoring of usage.

## **22.23. Peer on Peer Abuse**

22.1.23.1. In most instances, the conduct of pupils towards each other is covered by our Behaviour Policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. City of London Freeman's School recognise that children are capable of abusing their peers. Abuse is abuse and will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Bullying can amount to peer on peer abuse. A bullying incident is treated as a safeguarding concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. The forms of peer on peer abuse are (in a non-exhaustive list) outlined below.

22.1.4.23.1.1. sexual violence and sexual harassment, our policy on which can be found in paragraph 24 below

22.1.2.23.1.2. youth-produced sexual imagery ('sexting'), our policy on which can be found in paragraph 25 below

22.1.3.23.1.3. Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Appendix 2).

22.1.4.23.1.4. 'upskirting', a criminal offence which typically involves taking a picture under a person's clothing without him/her knowing, with the intention of viewing their genitals or buttocks for the purpose of sexual gratification or to cause the victim distress, humiliation, distress or alarm

22.1.5.23.1.5. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

22.1.6.23.1.6. Serious Youth Violence – Any offence of most serious violence or weapon-enabled crime, where the victim is aged 1-19- i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

23.1.7. initiation/hazing type violence and ritual

22.1.7.23.1.8. online bullying ('cyber-bullying')

22.2.23.2. The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

22.3.23.3. We recognise that pupils with SEN/D are particularly vulnerable to peer to peer abuse, and we are accordingly vigilant.

22.4.23.4. Freeman's recognises that it is more likely that boys will be perpetrators of peer on peer abuse, but that all peer on peer is unacceptable and will be taken seriously.

22.5.23.5. City of London Freeman's School aims to reduce the likelihood of peer on peer abuse through:

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- a culture of pupils being able to raise concerns with staff, knowing that they will be listened to, valued and believed;

- the appointment of Wellbeing Prefects in the Upper School, who work at a 'grass roots' level to promote pupil flourishing;
- robust risk assessments and providing targeted work for pupils identified as being a possible risk to other pupils and those identified as being at risk.

22.6-23.6. Research indicates that young people rarely disclose peer on peer abuse and that, if they do, it is likely to be to their friends. Therefore, City of London Freeman's School will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the School and what services they can contact for further advice.

22.7-23.7. Any concerns, disclosures or allegations of peer on peer abuse in any form are referred to the DSL using City of London Freeman's School's child protection procedures as set out in this policy. Where a concern regarding peer on peer abuse has been disclosed to the DSL, advice and guidance will be sought from Children's Social Care and, where it is clear a crime has been committed or there is a risk of crime being committed, the Police will be contacted. In line with our *Searches and Confiscation Policy*, the School may seize and examine a pupil's mobile 'phone or other device if there is good reason to suspect that it has been used to bully another child while the alleged perpetrator is under care of the School.

22.8-23.8. As with all safeguarding concerns, all disclosures, allegations, decisions, actions and the reasons for them are written down contemporaneously under the guidance of the DSL. Parents are informed at an early stage and involved in the process unless there is reason to believe that doing so would put the child at risk of harm.

22.9-23.9. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards are put in place to promote the well-being of the pupils affected and both the victim and perpetrator will be provided with support. This support will include the offer of meeting with the School Counsellor, and she will be asked to give / seek advice about the best form of ongoing support for the pupil(s) concerned that can be offered by external agencies and providers. Suspension of the pupil, against whom an allegation has been made, needs careful consideration, and the Head will seek the advice from SSCB and any other relevant City Officer before deciding on the course of action to be taken.

## **23.24. Managing reports of peer on peer sexual violence and harassment**

### **23.1.24.1. Responding to reports of sexual violence and sexual harassment**

**23.1.1.24.1.1.** Children making a report of sexual violence or sexual harassment are taken seriously, kept safe and are well supported.

**23.1.2.24.1.2.** Staff taking a report never promise confidentiality.

**23.1.3.24.1.3.** Staff taking the report informs the DSL immediately.

**23.1.4.24.1.4.** If a child is at risk of harm, is in immediate danger, or has been harmed, a referral (Request for Support Form) will be made to the C-SPA email: [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk) or telephone 0300 470 9100, as appropriate.

**23.1.5.24.1.5.** In line with our Searches and Confiscation Policy, the School may seize and examine a pupil's mobile 'phone or other device as part of its response.

**23.1.6.24.1.6.** Parents or carers are informed at an early stage (unless this would put the child at greater risk).

### **23.2.24.2. Risk Assessment**

**23.2.1.24.2.1.** Following a report the DSL makes an immediate risk and needs assessment, which considers;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

**23.2.2.24.2.2.** The risk assessment is recorded and kept under review.

**23.2.3.24.2.3.** Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments are used to inform the School's approach to supporting and protecting pupils.

**23.2.4.24.2.4.** Support regarding risk assessments can be accessed from the Education Safeguarding Team – [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

### **23.3.24.3. Action**

**23.3.1.24.3.1.** The DSL considers:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

### **23.4.24.4. Options**

**23.4.1.24.4.1.** The DSL, in consultation with the Headmaster, decides between the following options:

- Manage internally
- Early Help intervention



- Refer to C-SPA
- Report to the police (generally in parallel with a referral to C-SPA)

#### 23.5-24.5. Ongoing Response

23.5.1-24.5.1. The DSL manages each case individually and ensures that the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

23.5.2-24.5.2. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator is removed from any classes they share with the victim.

23.5.3-24.5.3. The DSL considers how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

23.5.4-24.5.4. Where a criminal investigation into a rape, assault by penetration or sexual assault or leads to a conviction or caution, the School takes disciplinary action in line with its Behaviour Policy and Exclusions Policy. Whether or not allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils) is one of several factors that will be considered.

23.5.5-24.5.5. The victim, alleged perpetrator and any other affected children and adults are offered appropriate support. The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and can occur at the same time if necessary.

### **24.25. Youth produced sexual imagery (sexting)**

24.1-25.1. The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

24.2-25.2. Youth produced sexual imagery refers to both images and videos where:

24.2.1-25.2.1. A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;

24.2.2-25.2.2. A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;

24.2.3-25.2.3. A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

24.3-25.3. All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance *Sexting in schools and colleges: responding to incidents and safeguarding young people*<sup>15</sup>.

24.4-25.4. Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

24.5-25.5. If a member of staff becomes aware of an incident involving youth produced sexual imagery he/she follows the child protection procedures and refers to the DSL as soon as possible. They decide whether or not it is necessary to search for and then confiscate any device involved. This is done in accordance with the School's *Searches and Confiscation Policy*. Any confiscated device is set

<sup>15</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

to flight mode, or, if this is not possible, turned off. Staff do not view, copy or print the youth produced sexual imagery. As with all safeguarding concerns, all disclosures, allegations, decisions, actions and the reasons for them are written down contemporaneously under the guidance of the DSL.

24.6-25.6. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents are informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to Children's Social Care or the Police as appropriate.

24.7-25.7. Immediate referral at the initial review stage is made to Children's Social Care/Police if:

24.7.1-25.7.1. The incident involves an adult;

24.7.2-25.7.2. There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);

24.7.3-25.7.3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;

24.7.4-25.7.4. The imagery involves sexual acts;

24.7.5-25.7.5. The imagery involves anyone aged 12 or under;

24.7.6-25.7.6. There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

24.8-25.8. If none of the above apply then the DSL uses his professional judgement to assess the risk to pupils involved and may decide, with input from the Headmaster, to respond to the incident without escalation to Children's Social Care or the police.

24.9-25.9. In applying judgement, the DSL will consider if:

24.9.1-25.9.1. there is a significant age difference between the sender/receiver;

24.9.2-25.9.2. there is any coercion or encouragement beyond the sender/receiver;

24.9.3-25.9.3. the imagery was shared and received with the knowledge of the child in the imagery;

24.9.4-25.9.4. the child is more vulnerable than usual;

24.9.5-25.9.5. there is a significant impact on the children involved;

24.9.6-25.9.6. the image is of a severe or extreme nature;

24.9.7-25.9.7. the child involved understands consent;

24.9.8-25.9.8. the situation is isolated or if the image been more widely distributed;

24.9.9-25.9.9. there other circumstances relating to either the sender or recipient that may add cause for concern, e.g. difficult home circumstances;

24.9.10-25.9.10. the children have been involved in incidents relating to youth produced imagery before.

24.10-25.10. If any of these circumstances are present the situation is escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation is managed within the School.

24.11-25.11. The DSL, in line with safeguarding recording procedures, records all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution.

## **25.26. Allegations against staff, including supply staff**

**26.1.** The School follows the Surrey procedures for managing allegations against staff including supply staff<sup>16</sup> and procedures set out in *Keeping Children Safe in Education*. 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.

**25.1-26.2.** *Keeping Children Safe in Education 2020 includes specific guidance on managing allegations against supply teachers. We recognise that, although we are the employer of supply teachers who work at the school, it is our responsibility to ensure that any allegations are dealt with properly.*

**25.2-26.3.** All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

**25.3-26.4.** All Staff are made aware at induction of the School's *Staff Code of Conduct*.

**25.4-26.5.** Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction<sup>17</sup>.

**25.5-26.6.** If a member of staff witnesses something, is party to information or receives an allegation by a pupil which suggests that a person, including supply staff, may be unsuitable to work with children, that member of staff immediately informs the Headmaster<sup>18</sup>.

**25.6-26.7.** The Headmaster on all such occasions discusses the content of the allegation with the Local Authority Designated Officer (LADO)<sup>19</sup> at the earliest opportunity and within one working day, and before taking any further action.

**25.7-26.8.** If the allegation made to a member of staff concerns the Headmaster, the person receiving the allegation immediately informs the Chair of Governors, who will consult the LADO as in 25.6 above, without notifying the Headmaster first.

**25.8-26.9.** Suspension of the member of staff, excluding the Headmaster, against whom an allegation has been made, needs careful consideration, and the Headmaster seeks the advice of the LADO and HR in making this decision.

**25.9-26.10.** In the event of an allegation against the Headmaster, the decision to suspend is made by the Chair of Governors with advice as in 25.7 above.

**25.10-26.11.** Any allegation regarding the Chair of Governors is referred to the LADO.

**25.11-26.12.** 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 Head will appoint a named representative to keep the individual informed of the progress of the case and consider what other support is appropriate.

**25.12-26.13.** Where an allegation is made against a member of the boarding staff, who is suspended pending an investigation of a safeguarding nature, the School will make appropriate arrangements for alternative accommodation for the staff member away from pupils.

<sup>16</sup> <http://surreyscb.procedures.org.uk/gkpph/safer-workforce-and-managing-allegations-against-staff-carers-and-volunteers/allegations-against-staff-carers-and-volunteers/#s1108>

<sup>17</sup> Refer to "Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings" available on the DfE website.

<sup>18</sup> or Chair of Governors in the event of an allegation against the Headmaster

<sup>19</sup> Duty LADO 0300 200 1006

~~25.13-26.14.~~ If a person against whom an allegation has been made resigns or we dismiss him/her, or in the case of a volunteer we cease to use his/her services, we will report him/her to the DBS within one month and ensure that any allegation is followed up in accordance with statutory guidance.

~~25.14-26.15.~~ The School will make a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: unacceptable professional conduct; conduct that may bring the profession into disrepute; a conviction, at any time, for a relevant offence.

~~25.15-26.16.~~ We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

~~25.16-26.17.~~ Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

~~25.17-26.18.~~ In the event of continuing concerns regarding the way the investigation has been progressed, any member of staff has the right to make a direct report (see parag. 26 Whistle-blowing).

## **26.27. Whistle-blowing**

**26.1-27.1.** We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

**26.2-27.2.** All staff are made aware at induction and at least annually of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the School's safeguarding arrangements. Any colleague who considers it necessary to 'blow the whistle' should follow the City of London's Whistleblowing Policy, which is given to all new staff at induction and is available in the Teacher's Guide on the Staff Shared Area.

**26.3-27.3.** The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

**26.4-27.4.** Independent Schools Inspectorate, which inspects City of London Freeman's School, can be contacted by parents who consider it necessary to 'blow the whistle' about safeguarding procedures and practice at the School. Contact: <https://www.isi.net/contact/> 020 7600 0100

**26.5-27.5.** Whistle-blowing regarding the Headmaster should be made to the Chair of the Governing Body (whose contact details are noted at the beginning of this document).

## **27.28. Physical Intervention**

27.1-28.1. We acknowledge that staff must only ever use physical intervention as a last resort in the following circumstances: when a child is endangering him/herself or others; to prevent serious damage to property. At all times the minimum force necessary must be used.

27.2-28.2. Such events should be recorded and signed by a witness.

27.3-28.3. We understand that unnecessary physical intervention may be considered under child protection or disciplinary procedures.

27.4-28.4. We recognise that touch is in some circumstances appropriate when working with children, and staff are given training on professional boundaries at Induction.

27.5-28.5. Our *Physical Restraint of Pupils Policy* contains more details on this topic.

## Appendix 1 - Indicators of abuse

### Neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff should be discussed with the DSL.

### Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

#### Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

#### Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

## Emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

#### Indicators of emotional abuse

##### Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

##### Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes



- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

#### Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

#### Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

## Physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

#### Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks

- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

## Sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCB Screening Tool and guidance](#) provides school staff with information regarding indicators of CSE (further information about CSE is available on pages 45-46).

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

## Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls

- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## Appendix 2 - Harmful sexual behaviour

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

**Developmental Sexual Activity** encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

**Inappropriate Sexual Behaviour** can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Further information and advice to assist in identifying and responding appropriately to sexual behaviour is available from the Brook Sexual Behaviours Traffic Light Tool<sup>20</sup>. Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

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<sup>20</sup> <https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>

## Appendix 3 - Child Sexual Exploitation

Staff should refer to Part A of 'Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation' (2017)<sup>21</sup> for comprehensive guidance on Child Sexual Exploitation.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- going missing from home or school
- regular school absence/truanting
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- socialising with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

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<sup>21</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

## Appendix 4 - Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### 4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- preserves a girl's virginity
- part of being a woman / rite of passage
- upholds family honour
- cleanses and purifies the girl
- gives a sense of belonging to the community
- fulfils a religious requirement
- perpetuates a custom/tradition
- helps girls be clean / hygienic
- is cosmetically desirable
- mistakenly believed to make childbirth easier

### Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries, including the UK.

#### **Circumstances and occurrences that may point to FGM happening are:**

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

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

#### **The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay** and make a referral to children's services.

## **Appendix 5 - Domestic Abuse**

### **How does it affect children?**

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self harm and anxiety.

### **What are the signs to look out for?**

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

### **What should I do if I suspect a family is affected by domestic abuse?**

Tell the School's Designated Safeguarding Lead, who will relay your concerns to the Surrey Domestic Abuse Helpline on 01483 776822 or talk to your local outreach service.

East Surrey Domestic Abuse Services - Covering Reigate & Banstead, Mole Valley and Tandridge - 01737 771350

Your Sanctuary Outreach Service Covering Woking, Runnymede and Surrey Heath - 01483 776822

North Surrey Outreach Service - Covering Epsom & Ewell, Elmbridge and Spelthorne - 01932 260690

South West Surrey Outreach Service - Covering Guildford and Waverley - 01483 577392



## Appendix 6 - Indicators of Vulnerability to Radicalisation

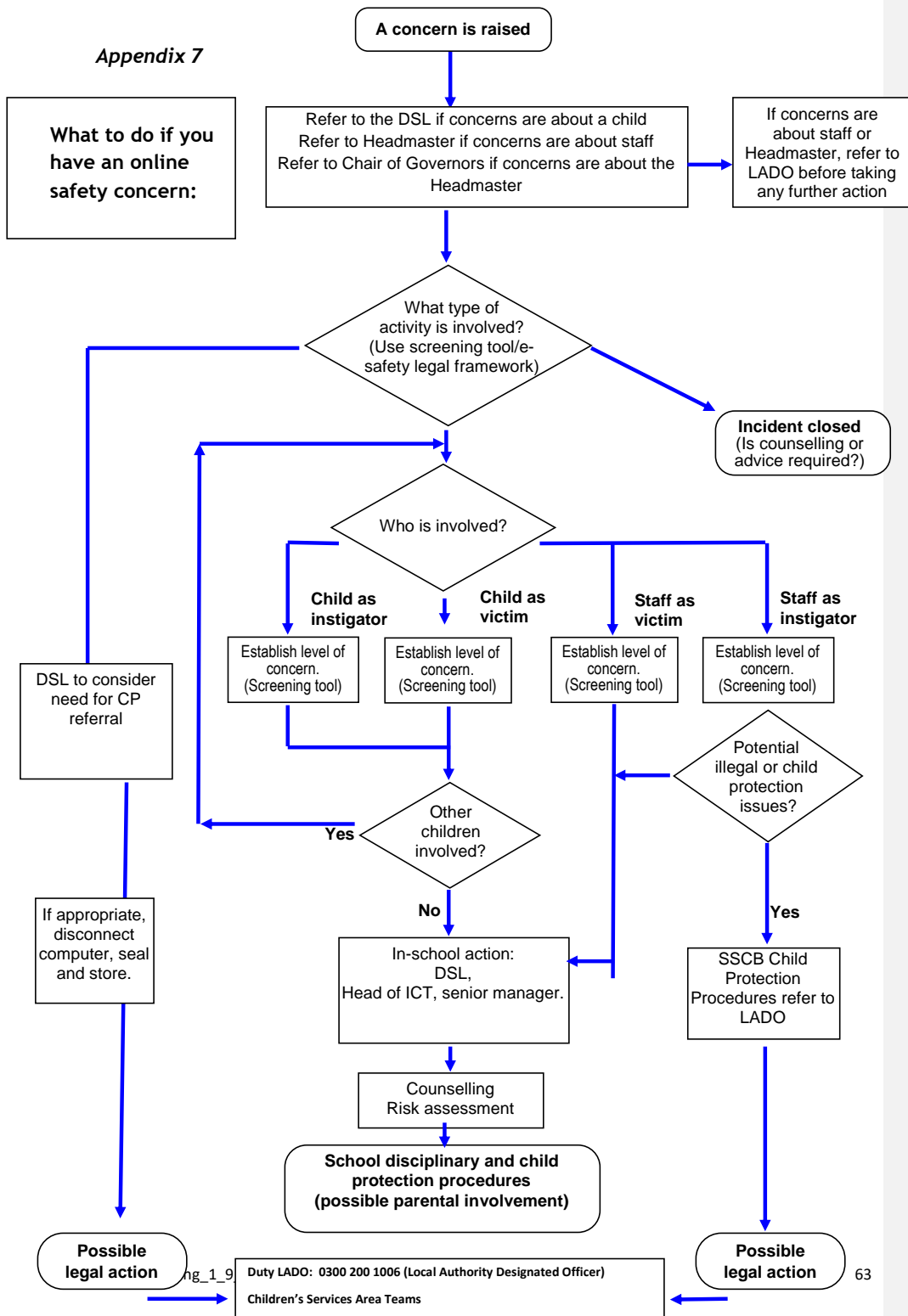
1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:  
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual 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, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:  
The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - seek to provoke others to terrorist acts;
  - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; he/she may have dissociated from their existing friendship group and become involved with a new and different group of friends; he/she may be searching for answers to questions about identity, faith and belonging;
  - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
  - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
  - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of his/her actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
  - being in contact with extremist recruiters;
  - accessing violent extremist websites, especially those with a social networking element;
  - possessing or accessing violent extremist literature;
  - using extremist narratives and a global ideology to explain personal disadvantage;
  - justifying the use of violence to solve societal issues;
  - joining or seeking to join extremist organisations; and

- significant changes to appearance and / or behaviour;
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

## Appendix 7

### What to do if you have an online safety concern:



## Appendix 8 - Further advice

Further advice on child protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents  
<http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

## Appendix 9 - Staff Code of Conduct

### *Introduction*

A relationship between an adult and a child or young person is not a relationship between equals. As a result of their knowledge, position and/or the authority invested in their role, all adults working in educational settings are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

This policy should be read as guidance for all working at The City of London Freeman's School regardless of their position or specific department.

To meet and maintain our responsibilities towards pupils, we need to agree standards of good practice which form a code of conduct for all staff. Good practice must include:

- Treating all pupils with respect.
- Setting the highest standards of personal conduct.
- Involving pupils in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among pupils at all times.
- Being prepared to listen.
- Being alert to changes in pupils' behaviour that may indicate that they are having problems.
- Reading, understanding and following the school's safeguarding policy and other policies relating to the welfare of pupils in the school.
- Maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- Applying the use of reasonable force only as a last resort and in compliance with the School's Physical Restraint Policy.
- Referring all concerns about a pupil's safety and welfare to the Designated Safeguarding Lead.
- Respecting pupils' privacy when getting changed for activities, or in a residential setting such as Walbrook (the boarding house) or on a school trip.
- Abiding by the School's policy on alcohol consumption by staff on school trips
- Abiding by the School's policy on smoking
- Taking opportunities to promote Fundamental British Values, and never undermining them
- Observing the School's Staff Dress Code, especially the imperative to dress modestly and professionally at all times
- Being alert to conflicts of interest (e.g. if a member of staff is also a Freeman's parent), and declaring them to a member of SLT if any arise

### *Confidentiality*

When considering whether or not to share any piece of sensitive or personal information, a balance must be struck between respecting privacy and ensuring that school staff are not unaware of information that would help them to support the pupil or member of staff concerned. At Freeman's, such information is therefore shared on a 'need-to-know' basis. Typically, any decision about who needs to know something and in what level of detail will be made by a middle or senior leader. Therefore, if a colleague receives a piece of sensitive information, he/she should not pass it on further without being told to do so. In the case of sensitive pastoral information about a child, typically only the Form Tutor, Head of Year and Designated Safeguarding Leads will be party to it.

Staff should take particular care when sending sensitive information via e-mail, checking that it is only sent to intended recipients. The use of initials instead of full names is encouraged, and e-mails should be marked Confidential.

Gossip should always be avoided; it is unprofessional, potentially harmful and not motivated by concern for the best interests of children or colleagues.

### *Maintaining Professional Boundaries*

All adults should clearly understand the need to maintain appropriate boundaries in their contacts with pupils. Adults should always maintain appropriate professional boundaries and avoid behaviour that might be misinterpreted by others. They should report and record any incident with this potential.

Inevitably, teachers and other staff will need, on occasions to have one to one contact with pupils. In these circumstances, ensure that the setting is appropriate and that the situation cannot be misinterpreted. The door of the room should be kept open and any blinds raised, and particular care should be taken to keep a clear physical space between pupil and member of staff. If a colleague is concerned about meeting a certain pupil one-to-one, he/she should arrange for a colleague to be present, or, if that is not possible or appropriate, notify a senior member of staff of where and when the meeting is happening.

In general terms, we must maintain professional boundaries by:

- Not engaging in gossip about other members of staff or other pupils.
- Not allowing a relaxed atmosphere inside or outside of the schoolroom to develop into an unprofessional informality.
- Not engaging in social activity with pupils.

### *Physical contact*

Although there are occasions when it is entirely appropriate and proper for staff to have physical contact with children, it is crucial that they only do so in ways appropriate to their professional role. Such occasions could include: using physical restraint to avoid a pupil harming himself/herself or others<sup>22</sup>; comforting a distressed younger child; helping a pupil to master a technique in a sport or musical instrument.

When physical contact is made with children it must be in response to their needs at that time, of minimum duration, sensitive to the respective genders of pupil and adult, and age-appropriate. In general, the older the child the fewer the circumstances in which it would be appropriate for there to be physical contact.

Staff must seek the child's permission before initiating contact or else wait for the pupil to initiate contact. Staff must observe and take note of the child's reaction or feelings.

Staff must never touch a child in a manner or on a part of the body that may be considered inappropriate. Staff must not engage in rough play, tickling or fun fights with pupils. Physical contact must never be secretive, for the gratification of the adult or abuse a position of trust. Staff should not apply sunscreen to pupils but rather invite pupils to ask a friend to do this.

If a member of staff is concerned that an episode of physical contact may have been misinterpreted, or if he/she has been subject to unwanted physical contact from a pupil, he/she should record the incident and share it with the DSL.

More detailed guidance regarding physical contact during sporting activities can be found in the *PE and Games Staff Handbook*.

### *Intimate Care*

Given the age of Freeman's pupils, it is rare that intimate care is needed outside the Medical Centre. However, if, say, a KS2 pupil urgently needs help in the toilet, one member of staff will go in to help and a second wait just outside the door.

### *Pupil privacy when changing*

The following protocol is to be observed around changing rooms:

- We recognise that pupils who are changing fall under our duty of care and need supervising, especially given that changing rooms are places that afford the opportunity for bad behaviour and/or bullying to take place
- Standards of behaviour in changing rooms are made clear to pupils at regular intervals, as well as the fact that staff may legitimately enter if they have good reason to do so

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<sup>22</sup> see the School's *Physical Restraint Policy*

- By default, changing is supervised by a same-sex member of staff being positioned just outside the changing rooms with the door kept open (unless to do so opens up a line of sight to pupils who are changing)
- Supervising teachers only enter the changing rooms with a good reason to do so e.g. they suspect bad behaviour, an accident has happened, or proactive supervision of pupils with special needs
- Male staff never enter girls' changing rooms and vice versa for female staff
- Before entering, teachers announce their intention to enter
- The minimum time possible is spent in the changing rooms before leaving and, while there, teachers behave in a way that is mindful of pupils' privacy and sensitive to the potential for embarrassment
- Other than in an emergency, teachers do not use any digital devices while in a changing room

When it is necessary to enter pupils' rooms on a school trip, this task is undertaken by a member of staff of the same sex (other than in an emergency). He/she announces his/her intention to enter so that pupils have the opportunity to cover up.

The privacy of boarders is respected by staff. Details of how this works in practice can be found in the School's *Boarding Staff Handbook*.

#### *Communication (including the use of electronic technology)*

Many of our newer staff are of an age where they have grown up with new and emerging technologies. The use of smart phones means that access to the internet and social networking sites is available whenever and wherever we are.

- The Acceptable use policies (AUP) for staff should be consulted and adhered to regarding use of social media.
- Many pupils will search to see if staff have a social networking account such as Facebook and Instagram and may attempt to contact them through this media. Staff need to use their professional judgement in dealing with such contacts and where necessary explain to the pupil that they will not respond to friend requests from them as they are adults in a professional position not their friend. Where pupils do attempt to make contact through social networking sites, staff should bring the matter to the attention of their line manager.
- Staff should be judicious in their contact – including social media contact – with recent leavers and exercise professional care and judgement at all times.
- Staff members rightly use new technologies on a daily basis to support and enhance the curriculum, and use internal email systems and school email addresses to communicate with pupils and their parents. However, new technologies should never be used to start or encourage a friendship or relationship with a pupil and communication should never fall into a loose informality.
- Adults should not as a general rule share any personal information with a pupil unless it is absolutely necessary.
- They should not request, or respond to, any personal information from the pupil, other than that which might be appropriate as part of their professional role.
- Adults should ensure that all communications are transparent and open to scrutiny.
- Adults should also be careful in their communications with pupils so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
- Staff should not give any of their personal contact details to pupils or parents, including email, home or mobile telephone numbers.
- Staff should only send e-mails to pupils' school e-mail addresses.
- School mobile telephones ought to be used on school trips, with personal mobile 'phones only used as a last resort. If used, any pupil telephone numbers stored on the 'phone for safety purposes must be deleted as soon as the trip is finished.
- E-mail or text communications between an adult and a pupil outside agreed protocols may lead to disciplinary and/or criminal investigations.
- They should ensure that personal social networking sites are set at private and that pupils are never listed as approved contacts.

#### *Transporting pupils in private vehicles*

As a general rule, staff should not use their private vehicles to transport pupils. However, this is permitted either in an emergency (e.g. to take a boarder to hospital) or if there is no practicable alternative and it is planned well in advance with the permission of the Deputy Head. In all cases:

- travel must be in line with the City's travel policies, including the vehicle and driver being authorised as 'grey fleet'
- two or more pupils should be in the car wherever possible, and pupils should sit on the back seat unless space does not permit
- the member of staff ensures that seatbelts are worn by all occupants

#### *Favouritism*

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to transparent, agreed criteria.

Whilst the paragraph above puts emphasis on avoiding favouritism, it is equally important to acknowledge that exclusion from activity can be used as a form of humiliation and abuse.

#### *Gifts and rewards*

The City of London Corporation has a clear policy regarding the receipt of gifts and rewards and this should be followed very carefully.

#### *Anti-Corruption Policy*

- The giving of gifts or rewards to pupils should be part of an agreed policy for supporting positive behaviour or recognising particular achievements: for example, prizes. In some situations, the giving of gifts as rewards may be accepted practice for a group of students for example a small reward from the Houseparent for good work in supporting House life, whilst in other situations the giving of a gift to an individual pupil will be part of an agreed plan, recorded and discussed with senior management.
- The guidance does acknowledge that there may be specific occasions when a member of staff may consider it appropriate to give a pupil a small, personal gift of insignificant value but this should only happen with the agreement of the line manager.
- If gifts are given it should be done openly and not based on favouritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or 'groom' a young person.
- The receiving of gifts is also an issue to be addressed and staff must not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment (see the policy above). It is fashionable now for parents to buy 'thank you' cards and gifts for members of staff at the end of the academic year and it is recognised that they could cause offence by not accepting them.

#### *Social Contact*

Adults should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise his/her professional judgement in making a response and ensure that the Deputy Head is aware. There will be occasions when there are social contacts between pupils and staff, where for example the parent and member of staff are part of the same social circle. These contacts however, will be easily recognised and openly acknowledged.

#### *Infatuation*

Occasionally, a pupil may develop an infatuation with an adult member of staff. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach and that they keep the Deputy Head fully informed.

#### *Grooming*



All staff should be aware that a person intent on sexual abuse of children will groom children and the adults around them to ensure that they can carry out their abusive behaviour and to ensure that they do not raise anybody's suspicion or that they make other people scared to blow the whistle. Some of the behaviours described above have been employed by sex offenders to cover up or to explain away their behaviour. It is important that staff do not behave in a way that could be misinterpreted, leaving themselves open to suspicion.

#### *The sexual exploitation of children and young people*

The sexual exploitation of children and young people has been identified throughout the UK, in both rural and urban areas, and in all parts of the world. It affects boys and young men as well as girls and young women. It robs children of their childhood and can have a serious long-term impact on every aspect of their lives, health and education. It damages the lives of families and carers and can lead to family break-ups. Sexual exploitation of children and young people is completely unacceptable and we must do all we can to help eradicate it. Children who are sexually exploited are the victims of sexual abuse and should be safeguarded from further harm. All staff should ensure that they are aware of vulnerability demonstrated by colleagues and pupils and respond appropriately.

#### *Protecting children from the risk of radicalisation*

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that all members of staff are able to identify children and colleagues who may be vulnerable to 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 duties.

Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

#### *The Legal Position*

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards children and young adults must be beyond reproach. Breaches of this code may well result in serious disciplinary action and may fall into the category of gross misconduct resulting in dismissal.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. Colleagues need to properly understand the law. This offence has nothing to do with the legal age of consent; it deals specifically with the abuse of a position of trust. This means that whether the young person consented is not the issue that determines whether the offence is committed and even if it is shown that a young person did consent to the relationship this does not detract from the seriousness of the offence. The legal definition of a child is a person under the age of 18 and all staff must be aware of this fact. If convicted of this offence, a person is likely to serve a custodial sentence and have their name added to the sex offender register.

The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts, it may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. This description of sexual activity includes the sending of explicit sexual images, emails and texts.

#### *Whistleblowing*

If staff have concerns about safeguarding practices within the School, they should report them and feel encouraged to do so. In such circumstances, the City's *Whistleblowing Policy* should be followed.

#### *Staff conduct in Walbrook (the boarding house)*

There are additional standards of staff behaviour to be observed when in Walbrook, even if spending time there as a visitor, and these can be found in the *Boarding Staff Handbook*.

#### *Coronavirus protocols*

Staff are required to follow instructions given regarding social distancing and hygiene- both maintaining it themselves and enforcing it among the pupil body. Rules should be enforced with patience and good humour initially, but staff should resort to the Behaviour Policy if necessary. As ever with pupil behaviour, leading by example is essential.

## Appendix 10 - Types of abuse and neglect

The following definitions are taken from *Working Together to Safeguard Children* (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based ~~violence~~ abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

### What is abuse and neglect?

Abuse and neglect are forms 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 institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

### Physical abuse

Physical abuse 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.

### Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

### 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 (including online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

[The SSCB Neglect Strategy](#) and the [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding neglect.

## **ADDENDUM-**

### **COVID-19 EPIDEMIC- IMPLICATIONS FOR SAFEGUARDING CHILDREN**

*last updated: 1/9/20*

Following a period of remote education for the majority of pupils during the Summer Term, the School site will, in line with [Government guidance](#), re-open to all pupils on 3<sup>rd</sup> September. Although this will make redundant the procedures that were put in place to address safeguarding considerations arising from lockdown, the re-opening Guidance notes that, on pupils' return to school, there should be heightened vigilance for "signs of harm". This has been emphasised to staff at INSET.

Secondly, the School is aware that a 'local lockdown' would necessitate taking up afresh the measures outlined in our COVID Addendum to this Policy. If this happens, this Policy will be amended forthwith.

Commented [SB5]: updated for full re-opening

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# Anti-bullying Policy

Anti-bullying Policy for both the Junior School and Senior School

Issue number	1.2
Name and appointment of owner / author	Stuart Bachelor, Deputy Head
Review Body	SLT and Full Board of Governors
Last updated	15 <sup>th</sup> September, 2020
Reason for update	annual review
Last reviewed by SLT	September 2020
Last reviewed by Governors	September 2018
Next SLT review due	September 2022
Next Governor review due	September 2020
Where available	Staff Handbook, School web-site (unrestricted area)

## ANTI-BULLYING POLICY

### Policy Statement

Bullying of any kind is unacceptable at Freeman's. If bullying does occur, at or outside school but involving members of the community, pupils should be able to tell and know that incidents will be dealt with promptly and effectively. Freeman's is a "telling" School. This means that *anyone* who knows that bullying is happening is expected to tell a member of staff.

The purpose of this Policy is to help to prevent bullying at Freeman's as far as reasonably practicable. It achieves this by informing all members of the School community of what bullying is, how to identify it, how serious it is and what they should do if they experience, witness or suspect it.

This Policy is mindful of the non-statutory DfE advice *Preventing and Tackling Bullying* (July 2017) and *Cyberbullying: Advice for headteachers and school staff* (November 2014). It should be read in conjunction with the following documents:

- Behaviour Policy
- Exclusions Policy
- Safeguarding Policy
- Searches and Confiscation Policy

### Definition of Bullying

Bullying is aggressive or insulting behaviour by an individual or group, often (but not necessarily) repeated over time, which hurts or harms another pupil or group physically or emotionally. Bullying has the potential to cause serious psychological and physical damage and, in the most extreme cases, suicide. It is often motivated by prejudice against particular groups/individuals on the basis of protected characteristics or other groups to which they belong for example, on ground of such as race, religion, culture, sex, gender, sexuality or gender identity (LGBT), special educational needs and disability or because the child is adopted, is looked after by the Local Authority or is a carer. All these reasons for bullying are regarded as equally unacceptable by the School. Bullying on the basis of protected characteristics is taken particularly seriously by the School.

Bullying can happen face-to-face or remotely, often involving technologies ('cyber-bullying'); it can happen on the School premises or off the premises. Bullying may involve: name-calling; taunting; mocking; making offensive comments; kicking; hitting; pushing; punching or any use of violence; unwanted physical contact or sexually abusive comments; taking belongings; producing offensive graffiti; gossiping; excluding people from groups; spreading hurtful and untruthful rumours through any medium; inappropriate text messages and emailing; inappropriate messaging on social networking sites such as Facebook, Snapchat or Instagram; sending or



spreading offensive or degrading images by phone or via the internet; the misuse of associated technology such as cameras, camera phones or video cameras; initiation rituals or other ceremonies. Although sometimes occurring between two individuals in isolation, it quite often takes place in the presence, or with the knowledge, of others.

Sometimes actual bullying is passed off as “banter” or “horseplay”. We are alert to this possibility and do not tolerate the masking of hurtful behaviour by it being called by a different name.

Bullying by Freeman's pupils which occurs outside school premises is taken as seriously by the School as bullying that happens on them. Sections 90 and 91 of the Education and Inspections Act 2006 allow us sanction our pupils for bullying outside school premises if it is reasonable for us to do so. We interpret the scope of “reasonable” to include, *inter alia*, bullying incidents on school trips or during other off-site school activities, on school or public transport to and from school, in Ashted or its vicinity, or any bullying which somehow implicates or make reference to the School itself.

Freemen's recognises that some episodes of bullying can amount to peer on peer abuse.

## The seriousness of bullying

In addition to any physical harm caused, bullying can seriously damage a young person's confidence and sense of self-worth, and he/she will often feel at fault in some way. It can lead to serious and prolonged emotional damage of an individual and, in some cases, leads to suicide. Those who perpetrate bullying or witness bullying can also experience emotional harm. Although not a criminal offence, there are criminal laws which apply to harassment and threatening behaviour.

## Possible Signs of Bullying

Pupils who are being bullied may show changes in behaviour. Adults should be aware of these possible signs and they should investigate if a child

- is frightened walking to or from School
- does not wish to travel by bus and may ask to be driven instead
- changes their usual routine
- is unwilling to go to School or truants
- becomes anxious or lacking in confidence, develops a stammer
- attempts or threatens suicide or runs away
- is unsettled at night and has nightmares
- feigns illness
- begins to do poorly in school work
- has torn clothes or whose belongings are damaged or “go missing”

- starts asking for money or starts stealing money
- loses their money
- has unexpected cuts or bruises
- is hungry because lunch/dinner money has been stolen
- begins to bully other children or siblings
- changes his/her eating habits
- is frightened to voice concerns
- gives improbable excuses for any of the above
- is afraid to use, or obsessively checks, social media and mobile phone messages

## **Reporting and investigating bullying / suspected bullying**

- Pupils or parents should report bullying incidents to any member of staff, but preferably their Form Tutor or Form Teacher.
- Staff always intervene when they witness bullying.
- If it is suspected with good reason that a pupil is using his/her mobile telephone or any other personal digital device to bully, the device may be seized in accordance with the School's Searches and Confiscation Policy.
- A written record of the incident or disclosure is made promptly and is lodged as a Secure Note in SchoolBase.
- Teachers always inform the relevant Form Tutor(s) and Head(s) of Year of any bullying or suspected bullying.
- Depending on the apparent severity of the incident, the behaviour / alleged behaviour is investigated either by a Head of Year or by a Head of Section. The aim of any investigation is to establish the facts of the matter.
- If pupils needs to be interviewed, a second person, usually a Form Tutor or Head of Year is typically present both to act as a support for the child and to take a note of the meeting. Written statements are subsequently produced and the pupil given the opportunity to verify them.
- The parents of pupils who are interviewed are always informed of this, typically shortly after the interview has taken place.
- If the investigator is a Head of Year, he/she will report to a Head of Section; if a Head of Section, he/she reports to the Deputy Head. The person receiving the report then decides on any further action.

## **Responding to a confirmed incident of bullying**

- Other than given the most extreme of extenuating circumstances, bullying is met with a serious sanction. Any insight and/or remorse shown by a pupil in relation to his/her wrongdoing is taken into account. Aggravated bullying, which is where there are factors present that make the bullying particularly morally offensive, is typically punishable by a

Head of Section Detention or suspension or, for the gravest incidents, permanent exclusion.

- The School works with social networks to take down any offensive content related to the incident.
- If necessary and appropriate, the Police are consulted.
- A bullying incident is treated as a safeguarding concern and as possible peer on peer abuse when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In these circumstances, our standard safeguarding procedures are followed.
- Parents of both the victim and the bully are informed. Both are asked to help with monitoring and to inform a nominated member of staff if the situation does not resolve itself. The situation is also monitored by staff in school to ensure that repeated bullying does not occur.
- If possible, pupils will be reconciled but the victim must be consulted before a meeting is arranged.
- Support will be given to help the bully or bullies change their behaviour.
- All incidents of confirmed bullying or of suspected yet unsubstantiated bullying are recorded in the whole-school Bullying Log, including whether or not it was on the basis of protected characteristics.

## The School prevents bullying and promotes an anti-bullying ethos in the following ways

- By treating all reports of bullying seriously.
- By reminding pupils that it is wrong to be a bystander who witnesses bullying but does nothing about it.
- By focusing in assemblies on different aspects of behaviour and by reminding pupils of the need to report any suspected bullying.
- Through the PSHE programme and the general curriculum by:
  - a) dealing with the topic of bullying in a way which explores why it happens and gives alternative ways of behaving and dealing with difficulties
  - b) using specialist trainers to teach pupils about using technology responsibly
  - c) using teaching methods which encourage co-operative work and a variety of groupings so that pupils extend their relationships beyond a small group of friends.
- By assessing the extent and nature of bullying from time to time through an anonymous questionnaire.
- By annually reviewing this policy, including at Governor level, and amending it if appropriate.
- By keeping pupils, parents, and staff aware of the policy and training staff in how to prevent bullying, how to spot it and what to do when it is suspected. There is further guidance in the Staff Handbook on how to deal with bullying and allegations of bullying.
- Given that bullying can amount to peer on peer abuse, the regular safeguarding agenda in Staff Briefing is sometimes given over to anti-bullying training.

- By keeping a Bullying Log that is reviewed at least annually by SLT so that patterns can be identified and strategic interventions made. Findings are shared with Governors.
- By promoting our pupil prefect system in all sections of the School and encouraging pupils to use the peer mentors. All prefects and peer mentors receive appropriate training.
- By restricting pupil internet access so that social networking sites are not accessible using school devices.
- By participating in nationwide campaigns such as the Diana Award's Big Anti-Bullying Assembly 2020.
- By enabling an Upper School Head of Year to be trained by *Girls on Board*, an anti-bullying organisation specialising in girl-on-girl bullying. This colleague is qualified to train other teachers in how to prevent and address such bullying, something which is being rolled out in 2021.
- Sponsoring an Enquiring Schools Project on causes of and strategies to counter bullying at Freeman's. This will give time and resources for an in-depth analysis by a colleague, together with a platform for her findings to be fed into our anti-bullying strategy.

<b>Committee(s)</b>	<b>Dated:</b>
Board of Governors of the City of London Freeman's School	<b>12 October 2020</b>
<b>Subject:</b> Head of Junior School's Report	<b>Public</b>
<b>Report of:</b> Matt Robinson	<b>For Information</b>

## Summary

The purpose of this report is to provide Members with an overview of events in the Junior School since the last Board meeting in the summer term.

## Recommendation(s)

It is recommended that Members note the contents and receive this report.

## Main Report

### Background

1. The purpose of this report is to provide Members with an overview of events in the Junior School since the last Board meeting. Life in the Junior School was extremely interesting for the staff and pupils before the summer break with lockdown then its easing. Children, staff and parents needed much reassurance and logistics had to be carefully considered.

Fortunately, we are back now and, as is often the case, once one gets going, problems and concerns either disappear or are quickly resolved.

This report will give Members a taste of the many activities in which the Junior School staff and pupils participated from the end of last academic year and the start of this one.

### Staff News

2. We have new permanent staff in the Junior School. A new teacher has joined Lower 2 as the usual teacher is now working for three days a week. A colleague who has covered several times before has returned to us, having worked at Freeman's in a number of year groups previously. She is the main class teacher of L3H. A new colleague has joined the drama department and is an Upper 3 form teacher. The Junior school administrator is on leave and her temporary replacement has been seconded from another office, who has made a fantastic start.

3. Five colleagues have joined as graduate assistants, and will be form teachers in the Junior school, one being aligned in great part to Form 1).
4. A colleague left at the end of the year, creating opportunities. The Head of Lower 3 has moved to Head of Upper 3. A colleague was promoted from Head of House to Head of Lower 3. A colleague who started last year, became the new Head of Junior Whittington.

### **Covid keyworker children**

5. From the start of the pandemic's restrictions we remained open for the children of keyworkers, ranging from 25 – 5 pupils on different days. On only a few occasions were there children from the Senior year groups. The staff gave up their time voluntarily during the Easter break, Summer half term and 10 days into the Summer holiday.

### **Second half of Summer term**

6. As per government instructions, Lower 3 (Yr 6) returned to School after half term and remained in three distinct bubbles based in the Junior Hall, the Recital Hall and the Stable block. The children, staff and parents became quite used to the strange systems at drop off and pick up times, which have become standard since. Not all the children came in, as a good number of parents chose to keep them at home, but each class was over three-quarters full at all times.
7. When the lockdown eased, we were able to facilitate more opportunities for the children in the Junior School, hosting a class from Form 1, Lower 2 and Upper 2 each day in the Boarding House, Dining Room and Sports Hall respectively. Each class came in on three occasions. In the very last four days we had each class from Upper 3 and Lower 4 in for a morning. We were very proud to have given every Junior child a chance to come back to school during the lockdown. Parents and children were very grateful
8. Governors have expressed their gratitude which was entirely appropriate as staff worked extraordinarily hard and in trying conditions through the Summer term, increasing their IT skills, knowledge and confidence. All children received live lessons, tutorials and assemblies; their work was marked and returned, and learning continued at pace. Due to there being no trips, no matches, no concerts and no Prize Day to prepare for, the children went beyond their usual curricula.

### **Works**

9. The Junior School has seen very few improvements over the Summer; some painting has occurred, there have been new ceiling and carpet tiles and slightly more technology around the building. Our concerns about play space remain as the cage is being used for parking while the Main House works take place (with my blessing) and Main House parking has been stopped. We are confident of further great improvements once that phase is complete.

## **School roll**

10. 94 children joined the Junior School this September, 51 into Form 1. The Junior School starts the term at 405, the largest number ever. Families continue to contact Admissions to join mid-year.
11. The end of the School day has been altered for their first two weeks as in previous years. Form 1 pupils finished at 3.30pm and this has again proved to be very successful, not least assisting the new approach to pick up which sees parents unable to stop for more time than it takes for their child to get in the vehicle. In week three the whole of KS2 were picked up at 3.50 and Upper 3 and older from 4.10 pm.
12. Recorded videos and two webinars, which acted as our Information and Social Sessions, have helped parents to settle in. The Heads of Year introduced their Form Tutor teams and gave relevant information about the year ahead.

## **New children welcomes**

13. The Assistant Head and I held welcome breaktime "Hot chocolate and chat" sessions to give those new children an opportunity to feedback to us their initial experiences.

## **Last Academic year**

14. One of the key aims of the year was to embed RAID (Read, Answer, Initial, Do) in Junior lessons so the pupils consider carefully their feedback and act upon it. Covid rather affected this constructive initiative but it continues this year.
15. Colleagues' IC literacy continued to grow as staff moved all resources online, using a number of platforms: SharePoint, Teams and Freelearning.
16. A Junior teacher continued her Model United Nations club (which involved Junior and Senior children), debating virtually on the COVID crisis, euthanasia and behaviour around public protesting.
17. The Musician in Residence created a glorious collaboration with local primary schools, including one for the physically handicapped, called *Even Apart We're Together*. An ensemble choir of primary age, the video cropped 30 or so children in and out ... it was extremely heart-warming and very well received, not least in the context of Prize Day.
18. Parents' evenings took place despite lockdown, via Teams, which the parents and staff very much enjoyed. It may well be a model for the future.
19. As the children continued to work so hard in lockdown, merits and distinctions continued to be given. We were able to hold a virtual announcement of the Kemp House shield, which was won by Hale house, in the Head of House's first year in post.

20. The Black Lives Matter initiative has had a direct effect on learning and teaching, with PSHE, RS and History curricula having been revamped. I gave an assembly on unconscious bias and segued the following week into micro-aggressions.
21. Having won the Dorking Rotary prize for creative writing earlier in the year, a pupil in L4Z was notified recently that he won 3<sup>rd</sup> place overall nationally in the Intermediate group. We await his trophy!
22. A colleague has accepted the challenge of fulfilling our Shakespeare Schools' Festival commitment, directing a virtual Julius Caesar. The Lower 4s have learned their lines and rehearsals take place via Teams.

## **Sport**

23. Before the pandemic struck, the games department had succeeded in achieving the ambitious goal of every child in the Junior School having participated in fixtures.
24. The hockey girls had a good year with Surrey County honours: three of the present Upper 4 made the U13s, one made the U14s, and another the goalkeeping academy.
25. One Upper 4 girl was selected for the Surrey U14 netball squad.
26. We had planned our first ever U13 girls' touch rugby match ... which we intend to hold again as soon as possible. The development of boys and girls offered the opportunity to play all sports, rather than gender specific ones, continues; indeed, this term all sports clubs are available to Junior School boys and girls: cricket, tennis, football and hockey.
27. The highlight of the affected Summer term was the whole School virtual sports day, in which the children were set all sorts of different sporting challenges. The Director of Sport and his team created a really special day of home-garden-based activities.

## **Charity**

28. The Junior School's charitable giving was obviously curtailed by Covid but we were still able to support our charity for the year, Sightsavers. The Sponsored Read raised £1854 + £5000 via the Edith Murphy Foundation and the Junior School Sponsored Walk £50. The Junior School Prefects Fair raised £197 and the pancake tea £205. Many thanks go to ECN our new Charities co-ordinator.

## **Twitter**

We are up to 771 followers.

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**Twitter:** @JuniorFreemens



<b>Committee:</b> Board of Governors of the City of London Freeman's School	<b>Date:</b> 12 October 2020
<b>Subject:</b> Draft Annual Report and Financial Statements for the year ended 31 March 2020 for the Charities Administered in Connection with The City of London Freeman's School	<b>Public</b>
<b>Report of:</b> The Chamberlain	<b>For Information</b>
<b>Report author:</b> Steven Reynolds, Chamberlain's Department	

## **Draft Annual Report and Financial Statements for the year ended 31 March 2020**

1. The draft 2019/20 Annual Report and Financial Statements for the Charities Administered in Connection with The City of London Freeman's School (charity number: 312120) are attached.
2. During the year ended 31 March 2020 total funds decreased by £29,856 to £173,034 (2018/19: total funds increased by £4,515 to £202,890). This movement comprised the following:
  - i) a net loss on investments of £36,729 (2018/19: a net loss on investments of £1,870);
  - ii) investment income of £7,394 (2018/19: £6,917);
  - iii) voluntary income of £7,155 (2018/19: £7,149); and
  - iv) expenditure of £7,676 (2018/19: £7,681) relating to 255 book prizes (2018/19: 246 book prizes).
3. BDO LLP is auditing the draft Annual Report and Financial Statements, which will be submitted to the Finance Committee on 10 November 2020 for approval on behalf of the Court of Common Council.

## **Recommendation**

4. It is recommended that members receive this report for information.

## **Appendices**

- Appendix – Charities Administered in Connection with The City of London Freeman's School – Draft Annual Report and Financial Statements for the year ended 31 March 2020

**Contact**

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## Charities Administered in Connection with (ICW) the City of London Freemen's School (CLFS)

Annual Report and Financial Statements for the  
year ended 31 March 2020

Charity registration number 312120

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## **ORIGINS OF THE CHARITY**

The City of London Corporation was appointed by the Charity Commission for England and Wales on 30 November 2011 as Trustee of the charitable funds governed by the Charities Administered in Connection with the City of London Freeman's School.

The funds of the charity are used to provide prizes in various subjects at the City of London Freeman's School. In the past, funds have also been used to assist children to study various subjects at the School and to aid former pupils who have gone on to study at universities.

# TRUSTEE'S ANNUAL REPORT

## STRUCTURE AND GOVERNANCE

### GOVERNING DOCUMENTS

The Charity Commission for England and Wales made an Order on 30 November 2011 which appointed the City of London Corporation as Trustee of the charitable funds governed by this charity. The Schedule attached to the Order details the constituent charitable funds of the Charities Administered ICW the City of London Freeman's School. The Funds are registered under the same name for administrative purposes.

### GOVERNANCE ARRANGEMENTS

The Mayor and Commonalty and Citizens of the City of London (also referred to as 'the City Corporation' or 'the City of London Corporation'), a body corporate and politic, is the Trustee of the Charities Administered ICW the City of London Freeman's School. the City Corporation is Trustee acting by the Court of Common Council of the City of London in its general corporate capacity and that executive body has delegated responsibility in respect of the administration and management of this charity to various committees and sub-committees of the Common Council, membership of which is drawn from 125 elected Members of the Common Council and external appointees to those committees. In making appointments to committees, the Court of Common Council will take into consideration any particular expertise and knowledge of the elected Members, and where relevant, external appointees. External appointments are made after due advertisement and rigorous selection to fill gaps in skills. Members of the Court of Common Council are unpaid and are elected by the electorate of the City of London

The key Committee which has responsibility for directly managing matters related to the charity is the Board of Governors of the City of London Freeman's School, which is ultimately responsible to the Court of Common Council of the City of London. Committee meetings are held in public, enabling the decision-making process to be clear, transparent and publicly accountable. Details of the membership of Committees of the City Corporation are available at [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk).

The Trustee believes that good governance is fundamental to the success of the charity. A comprehensive review of governance commenced during the year and is ongoing to ensure that the charity is effective in fulfilling its objectives. Reference is being made to the good practices recommended within the Charity Governance Code throughout this review. Focus is being placed on ensuring regulatory compliance and the ongoing maintenance of an efficient and effective portfolio of charities that maximise impact for beneficiaries.

## **OBJECTIVES AND ACTIVITIES**

The objectives of the charity are to provide funds by awarding prizes in various subjects, and to assist children to study various subjects at school and also to aid school pupils who have gone on to university.

## **INVESTMENT POLICY**

The charity's investments are held in units of the City of London Charities Pool (registered charity 1021138). The investment policy of the Charities Pool is to provide a real increase in annual income in the long term whilst preserving the value of the capital base. The annual report and financial statements of the Charities Pool (which include an analysis of investment performance against objectives set) are available from the Chamberlain of London, at the email address stated on page 22.

## **PUBLIC BENEFIT STATEMENT**

The Trustee confirms that it has referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the Charities Administered ICW the City of London Freeman's School's aims and objectives and in planning future activities. The purposes of the charity are to provide funds to assist children to study various subjects at school, and for some of the older funds, to aid school pupils who have gone on to university. Funds are also provided for prizes in various subjects.

Consequently, the Trustee considers that the Charities Administered ICW the City of London Freeman's School operates to benefit the general public and satisfies the public benefit test.

## **REFERENCE AND ADMINISTRATIVE DETAILS**

The administrative details of the charity are stated on page 22.

## **ACHIEVEMENTS AND PERFORMANCE**

The school awarded 255 prizes during the year (2018/19: 246).

## **PLANS FOR FUTURE PERIODS**

The on-going targets are to continue to provide for prizes in various subjects, to continue to provide sums to assist children to study various subjects at the school and to assist in further education.

Prior to the end of the financial year of the charity, the Coronavirus (COVID-19) pandemic began. This impacted on the value of the investments held by the charity and is expected to impact on the future level of income available to meet the objectives of the charity.

The Trustee is monitoring the situation and will continue with its operating model of only committing expenditure from available income funds. Where deemed necessary, future expenditure on charitable activities may be placed on hold until adequate investment income has been received.



## FINANCIAL REVIEW

### Overview of Financial Performance

#### Income

In 2019/20 the charity's total income for the year was £14,549, an overall increase of £483 against the previous year (2018/19: an overall increase of £1,783 against the previous year).

Income from charitable activities comprised £7,155 from donations received (2018/19: £7,149). Investment income was £7,337 (2018/19: £6,845) and interest from cash balances was £57 (2018/19: £72).

#### Expenditure

Total expenditure for the year was £7,676 (2018/19: £7,681), which entirely related to charitable activities. This expenditure consisted of prizes awarded to pupils at the school.

#### Investments performance

As at 31 March 2020, the investments held in the Charities Pool achieved a gross return of -14.78% (2018/19: 4.05%) compared to the FTSE All Share Index return of -18.45% (2018/19: 6.36%). Over three years this fund achieved a return of -2.44% (2018/19: 8.31%) compared to the FTSE All Share Index return of -4.24% (2018/19: 9.51%). Over five years, the fund achieved a return of 1.37% (2018/19: 6.77%) compared to the FTSE All Share Index return of 0.57% (2018/19: 6.10%).

	2019/20		2018/19	
	3 year	5 year	3 year	5 year
City of London Charities Pool	-2.44%	1.37%	8.31%	6.77%
FTSE All Share	-4.24%	0.57%	9.51%	6.10%
Fund outperformance	+1.80%	+0.80%	-1.20%	+0.67%

#### Funds held

The charity's total funds held decreased by £29,856 (14.7%) to £173,034 as at 31 March 2020 (2018/19: total funds held increased by £4,515 (2.3%) to £202,890 as at 31 March 2019). This is largely due to losses of £36,729 (2018/19: losses of £1,870) on the investments held within the City of London Charities Pool based on valuations as at 31 March 2020. The valuations are linked to the UK stock market, which experienced a significant fall during February and March 2020 as a result of the Coronavirus (COVID-19) pandemic.

Within the total funds held, £12,846 (2018/19: £13,497) represent permanent endowment funds which are held as a capital fund to generate income for the primary objectives of the charity. Any income arising from this capital is shown against the fund and then transferred to the restricted funds. Restricted income funds amounted to £160,188 (2018/19: £189,393) and comprised of voluntary and investment income.

Any undistributed restricted income is held for use in future years in accordance with the objectives of the charity.

Details of all funds held, including their purposes, is set out within note 9 to the financial statements.

### **Reserves policy**

The charity holds an endowment fund, for which it maintains the capital base and uses the investment income in accordance with the objectives of the charity. Further to this, it holds a restricted fund which is utilised in accordance with the wishes of its donors. Consequently, the charity has no free reserves and a reserves policy is considered by the Trustee to be inappropriate.

### **Principal Risks and Uncertainties**

The charity is committed to a programme of risk management as an element of its strategy to preserve the charity's assets. In order to embed sound practice the senior leadership team ensures that risk management policies are applied, that there is an on-going review of activity and that appropriate advice and support is provided. A key risk register has been prepared for the charity, which has been reviewed by the Trustee. This identifies the potential impact of key risks and the measures which are in place to mitigate such risks.

## TRUSTEE RESPONSIBILITIES

The Trustee is responsible for preparing the Annual Report and the Financial Statements in accordance with applicable law and regulations.

Charity law requires the Trustee to prepare the financial statements for each financial year in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under charity law the Trustee must not approve the financial statements unless the Trustee is satisfied that they give a true and fair view of the state of affairs of the charity and of the incoming resources and application of resources, including the income and expenditure, of the charity for that period. In preparing these financial statements, the Trustee is required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in business.

The Trustee is responsible for keeping adequate accounting records that are sufficient to show and explain the charity's transactions and disclose with reasonable accuracy at any time the financial position of the charity and enable the Trustee to ensure that the financial statements comply with the Charities Act 2011. The Trustee is also responsible for safeguarding the assets of the charity and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

In so far as the Trustee is aware:

- there is no relevant audit information of which the charity's auditors are unaware; and
- the Trustee has taken all steps that they ought to have taken to make themselves aware of any relevant audit information and to establish that the auditors are aware of that information.

Financial statements are published on the Trustee's website in accordance with legislation in the United Kingdom governing the preparation and dissemination of financial statements, which may vary from legislation in other jurisdictions. The maintenance and integrity of the Trustee's website is the responsibility of the Trustee. The Trustee's responsibility also extends to the ongoing integrity of the financial statements contained therein.

Adopted and signed for on behalf of the Trustee.

Jeremy Paul Mayhew MA MBA  
Chairman of Finance Committee of  
The City of London Corporation  
Corporation  
Guildhall, London  
XX Month 2020

Jamie Ingham Clark FCA  
Deputy Chairman of Finance  
Committee of The City of London

# **INDEPENDENT AUDITOR'S REPORT TO THE TRUSTEE OF THE CHARITIES ADMINISTERED ICW THE CITY OF LONDON FREEMEN'S SCHOOL**

## **Opinion**

We have audited the financial statements of the City of London School for Girls Bursary Fund incorporating City of London School for Girls Scholarships and Prizes Fund (the charity) for the year ended 31 March 2020 which comprise the statement of financial activities, the balance sheet and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the charity's affairs as at 31 March 2020 and of its incoming resources and application of resources for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Charities Act 2011.

## **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the charity in accordance with the ethical requirements relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## **Conclusions related to going concern**

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Trustee's use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the Trustee have not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the charity's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

## **Other information**

The other information comprises the information included in the Annual Report, other than the financial statements and our auditor's report thereon. The Trustee is responsible for the other information.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

## **Matters on which we are required to report by exception**

We have nothing to report in respect of the following matters in relation to which the Charities Act 2011 requires us to report to you if, in our opinion;

- the information contained in the financial statements is inconsistent in any material respect with the Trustee's Annual Report; or
- adequate accounting records have not been kept; or
- the financial statements are not in agreement with the accounting records and returns; or
- we have not received all the information and explanations we require for our audit.

## **Responsibilities of the Trustee**

As explained more fully in the Trustee's responsibilities statement, the Trustee is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Trustee is responsible for assessing the charity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intend to liquidate the charity or to cease operations, or have no realistic alternative but to do so.

## **Auditor's responsibilities for the audit of the financial statements**

We have been appointed as auditor under section 144 of the Charities Act 2011 and report in accordance with the Act and relevant regulations made or having effect thereunder.

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located at the Financial Reporting Council's ("FRC's") website at:

<https://www.frc.org.uk/auditorsresponsibilities>.

This description forms part of our auditor's report.

## **Use of our report**

This report is made solely to the charity's Trustee, as a body, in accordance with the Charities Act 2011. Our audit work has been undertaken so that we might state to the charity's Trustee those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charity and the charity's Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Fiona Condrón (Senior Statutory Auditor)  
For and on behalf of BDO LLP, statutory auditor  
London

Date

BDO LLP is eligible for appointment as auditor of the charity by virtue of its eligibility for appointment as auditor of a company under section 1212 of the Companies Act 2006.

BDO LLP is a limited liability partnership registered in England and Wales (with registered number OC305127).

# STATEMENT OF FINANCIAL ACTIVITIES

FOR THE YEAR ENDED 31 MARCH 2020

	Notes	Restricted Funds £	Endowment Funds £	2019/20 Total Funds £	2018/19 Total Funds £
<b>Income &amp; endowments from:</b>					
Voluntary income	2	7,155	-	<b>7,155</b>	7,149
Investments	3	7,263	131	<b>7,394</b>	6,917
<b>Total income</b>		<b>14,418</b>	<b>131</b>	<b>14,549</b>	14,066
<b>Expenditure on:</b>					
Charitable activities	4	7,676	-	<b>7,676</b>	7,681
<b>Total expenditure</b>		<b>7,676</b>	<b>-</b>	<b>7,676</b>	7,681
Net (losses) on investments	9	(36,078)	(651)	<b>(36,729)</b>	(1,870)
<b>Net income / (expenditure)</b>		<b>(29,336)</b>	<b>(520)</b>	<b>(29,856)</b>	4,515
<b>Transfers between funds</b>	9	131	(131)	-	-
<b>Net movement in funds</b>		<b>(29,205)</b>	<b>(651)</b>	<b>(29,856)</b>	4,515
<b>Reconciliation of funds:</b>					
Total funds brought forward	8&9	189,393	13,497	<b>202,890</b>	198,375
<b>Total funds carried forward</b>	8&9	<b>160,188</b>	<b>12,846</b>	<b>173,034</b>	202,890

All of the above results are derived from continuing activities.

There were no other recognised gains and losses other than those shown above.

The notes on pages **14 to 21** form part of these financial statements.



**BALANCE SHEET****AS AT 31 MARCH 2020**

	Notes	<b>2020 Total £</b>	2019 Total £
<b>Fixed assets:</b>			
Investments	7	<b>158,795</b>	189,189
<b>Total fixed assets</b>		<b>158,795</b>	189,189
<b>Current assets</b>			
Cash at bank and in hand		<b>14,239</b>	13,701
<b>Total current assets</b>		<b>14,239</b>	13,701
<b>Total net assets</b>		<b>173,034</b>	202,890
<b>The funds of the charity:</b>			
Endowment funds	8&9	<b>12,846</b>	13,497
Restricted funds	8&9	<b>160,188</b>	189,393
<b>Total funds</b>		<b>173,034</b>	202,890

The notes on pages 14 to 21 form part of these financial statements

Approved and signed on behalf of the Trustee.

Dr Peter Kane

Chamberlain of London

XX Month 2020

## NOTES TO THE FINANCIAL STATEMENTS

### 1. ACCOUNTING POLICIES

The following accounting policies have been applied consistently in dealing with items that are considered material in relation to the financial statements of the charity.

#### (a) Basis of preparation

The financial statements of the charity, which is a public benefit entity under FRS102, have been prepared under the historical cost convention and in accordance with the Statement of Recommended Practice (SORP) Accounting and Reporting by Charities, published in 2015, Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (FRS 102) and the Charities Act 2011.

#### (b) Going concern

The financial statements have been prepared on a going concern basis as the Trustee considers that there are no material uncertainties about the charity's ability to continue as a going concern. The charity only spends the income that is generated from donations and investments, so maintaining its capital base. The latest forecast anticipates that adequate funds will be available in the next five years to enable the charity to continue to fulfil its obligations.

In making this assessment, the Trustee has considered the potential impact of the Coronavirus (COVID-19) pandemic on the value of investment assets held, future income levels and the liquidity of the charity over the next 12-month period. The policy of only approving expenditure commitments from available income provides the flexibility to ensure the long-term viability of the charity despite reductions in investment values that have occurred. For this reason, the Trustee continues to adopt a going concern basis for the preparation of the financial statements.

#### (c) Key management judgements and assumptions

The preparation of the financial statements requires management to make judgements, estimates and assumptions that affect the application of policies and reported amounts of assets and liabilities, income and expenditure. The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances, the result of which form the basis of decisions about carrying values of assets and liabilities that are not readily apparent from other sources. The resulting accounting estimates will, by definition, seldom equal the related actual results.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected. Management do not consider there to be any material revisions requiring disclosure.

**(d) Statement of Cash Flows**

The charity has taken advantage of the exemption in FRS102 (paragraph 1.12b) from the requirements to produce a statement of cash flows on the grounds that it is a small entity.

**(e) Income**

All income is included in the Statements of Financial Activities (SOFA) when the charity is legally entitled to the income; it is more likely than not that economic benefit associated with the transaction will come to the charity and the amount can be quantified with reasonable certainty. Income consists of donations, investment income and interest.

**(f) Expenditure**

Expenditure is accounted for on an accruals basis and has been classified under the principal category of 'expenditure on charitable activities'. Liabilities are recognised as expenditure as soon as there is a legal or constructive obligation committing the charity to that expenditure, it is probable that settlement will be required, and the amount of the obligation can be measured reliably.

The charity does not employ any staff. Officers of the City Corporation provide administrative assistance to the charity when required, but this is not considered material and is not separately calculated by the City Corporation. It is consequently not possible to quantify this assistance within expenditure in the Statement of Financial Activities.

**(g) Taxation**

The charity meets the definition of a charitable trust for UK income tax purposes, as set out in Paragraph 1 Schedule 6 of the Finance Act 2010. Accordingly, the charity is exempt from UK taxation in respect of income or capital gains under part 10 of the Income Tax Act 2007 or section 256 of the Taxation of Chargeable Gains Act 1992, to the extent that such income or gains are applied exclusively to charitable purposes.

**(h) Investments**

Investments are made in the City of London Charities Pool (charity number 1021138) which is an investment mechanism operating in a similar way to a unit trust. This enables the City of London Corporation to "pool" small charitable investments together and consequently obtain better returns than would be the case if investments were made individually.

Investments were previously valued at mid-price. To ensure compliance with FRS102, bid-price is now used. The difference in valuation as a result in the year is considered immaterial. Gains and losses for the year on investments held as fixed assets are included in the Statement of Financial Activities.

**(i) Funds structure**

Income, expenditure and gains/losses are allocated to particular funds according to their purpose:

**Permanent endowment fund** – this fund consists of funds which are held in perpetuity for the benefit of the charity as a result of conditions imposed by the original donors and trusts. Income generated from the investments which represent these funds can be spent on the charitable purpose of the charity and are allocated to the restricted income fund. Gains/losses on the underlying assets remain as part of the endowment.

**Restricted funds** – These include income that is subject to specific restrictions imposed by donors, with related expenditure deducted when incurred.

**(j) Insurance**

The charity, elected Members and staff supporting the charity's administration are covered by the City Corporation's insurance liability policies, and otherwise under the indemnity the City Corporation provides to Members and staff, funded from City's Cash.

**2. INCOME FROM VOLUNTARY ACTIVITIES**

	<b>Restricted funds 2019/20 £</b>	<b>Restricted funds 2018/19 £</b>
Donations and legacies	<b>7,155</b>	<b>7,149</b>

### 3. INCOME FROM INVESTMENTS

	Restricted funds £	Endowment funds £	<b>Total 2019/20 £</b>
Investment income	7,206	131	<b>7,337</b>
Interest	57	-	<b>57</b>
<b>Total</b>	<b>7,263</b>	<b>131</b>	<b>7,394</b>

	Restricted funds £	Endowment funds £	<b>Total 2018/19 £</b>
Investment income	6,718	127	<b>6,845</b>
Interest	72	-	<b>72</b>
<b>Total</b>	<b>6,790</b>	<b>127</b>	<b>6,917</b>

### 4. EXPENDITURE ON CHARITABLE ACTIVITIES

	Restricted funds		Restricted funds	
	Direct costs £	<b>Total 2019/20 £</b>	Direct costs £	<b>Total 2018/19 £</b>
Prizes awarded	7,676	<b>7,676</b>	7,681	<b>7,681</b>

Charitable activities consist of 255 prizes awarded to individuals (2018/19: 246 prizes).

### 5. AUDITOR'S REMUNERATION

BDO are the auditors of the City of London's City's Cash Fund and all of the different charities of which it is Trustee. The City of London Corporation charges the audit fee to its City's Cash Fund and does not attempt to apportion the audit fee between the different charities. No other services were provided to the charity by its auditors during the year (2018/19: nil).

### 6. TRUSTEE EXPENSES

The members of the City of London Corporation acting on behalf of the Trustee did not receive any remuneration or reimbursement of expenses during 2019/20 (2018/19: nil).

## 7. INVESTMENTS

The investments are held in the City of London Corporation Charities Pool, a charity registered in the UK with the Charities Commission (charity number 1021138). The Charities Pool is a UK registered unit trust.

The value of investments held by the charity are as follows:

	<b>Total 2020 £</b>	<b>Total 2019 £</b>
Market value 1 April	<b>189,189</b>	185,988
Additions	<b>6,335</b>	5,071
(Loss)/gain for the year	<b>(36,729)</b>	(1,870)
<b>Market value 31 March</b>	<b>158,795</b>	189,189
<b>Cost 31 March</b>	<b>126,873</b>	120,538
Units held in Charities Pool	<b>22,375</b>	21,696

The type of listed investments held as at 31 March was as follows:

	<b>Total at 31 March 2020 £</b>	<b>Total at 31 March 2019 £</b>
Equities	<b>141,011</b>	167,811
Pooled Units	<b>11,433</b>	12,865
Cash held by Fund Manager	<b>6,351</b>	8,513
<b>Total</b>	<b>158,795</b>	189,189

A loss of £36,729 (2018/19: £1,870) occurred on investments, based on valuations as at 31 March 2020. The valuations are linked to the UK stock market, which experienced a significant fall during February and March 2020 as a result of the Coronavirus (COVID-19) pandemic.

**8. ANALYSIS OF NET ASSETS BY FUND**

	Restricted funds £	Endowment funds £	<b>Total at 31 March 2020 £</b>	Total at 31 March 2019 £
Fixed assets - investments	155,949	2,846	<b>158,795</b>	189,189
Current assets	4,239	10,000	<b>14,239</b>	13,701
<b>Total</b>	<b>160,188</b>	<b>12,846</b>	<b>173,034</b>	<b>202,890</b>

At 31 March 2019

	Restricted funds £	Endowment funds £	Total at 31 March 2019 £	Total at 31 March 2018 £
Fixed assets - investments	185,692	3,497	189,189	185,988
Current assets	3,701	10,000	13,701	12,387
<b>Total</b>	<b>189,393</b>	<b>13,497</b>	<b>202,890</b>	<b>198,375</b>

## 9. MOVEMENT IN FUNDS

<b>At 31 March 2020</b>	<b>Total 1 April 2019 £</b>	<b>Income £</b>	<b>Expendi- ture £</b>	<b>Losses £</b>	<b>Transfers £</b>	<b>Total 31 March 2020 £</b>
Endowment funds:						
Permanent endowment	13,497	131	-	(651)	(131)	<b>12,846</b>
Restricted fund	189,393	14,418	(7,676)	(36,078)	131	<b>160,188</b>
<b>Total funds</b>	<b>202,890</b>	<b>14,549</b>	<b>(7,676)</b>	<b>(36,729)</b>	<b>-</b>	<b>173,034</b>

<b>At 31 March 2019</b>	<b>Total 1 April 2018 £</b>	<b>Income £</b>	<b>Expendi- ture £</b>	<b>Losses £</b>	<b>Transfers £</b>	<b>Total 31 March 2019 £</b>
Endowment funds:						
Permanent endowment	13,529	127	-	(32)	(127)	13,497
Restricted fund	184,846	13,939	(7,681)	(1,838)	127	189,393
<b>Total funds</b>	<b>198,375</b>	<b>14,066</b>	<b>(7,681)</b>	<b>(1,870)</b>	<b>-</b>	<b>202,890</b>

A loss of £36,729 (2018/19: £1,870) occurred on investments, based on valuations as at 31 March 2020. The valuations are linked to the UK stock market, which experienced a significant fall during February and March 2020 as a result of the Coronavirus (COVID-19) pandemic.

### Purpose of endowment funds

The permanent endowment fund is held in perpetuity as a capital fund to generate income for the activities of the charity and represents the original assets of the charity, reported at current market value. Any income from this fund is accounted for within unrestricted income funds.

### Purpose of transfers between funds

Income from investments is shown against the endowment fund and then transferred to the restricted fund. The transferred income is held for use in accordance with the objectives of the charity.



**Purpose of restricted funds**

The purpose of this fund is to award prizes in various subjects, with any surplus income carried forward to be used in subsequent years. Awards are funded by donations and any investment income generated.

**10. RELATED PARTY TRANSACTIONS**

The City Corporation is the sole Trustee of the charity, as described on page 2.

The charity is required to disclose information on related party transactions with bodies or individuals that have the potential to control or influence the charity. Members are required to disclose their interests, and these can be viewed online at [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk).

Members and senior staff are requested to disclose all related party transactions, including instances where their close family has made such transactions.

Figures in brackets represent the amounts due at the balance sheet date.

Related party	Connected party	2019/20	2018/19	Detail of transaction
		£	£	
The City of London Corporation	The City of London Corporation is the Trustee of this charity	7,337	6,845	Distribution from the Charities Pool

## REFERENCE AND ADMINISTRATION DETAILS

**CHARITY NAME:** Charities administered ICW the City of London Freeman's School

Registered charity number: 312120

**PRINCIPAL OFFICE OF THE CHARITY & THE CITY CORPORATION:**

Guildhall, London, EC2P 2EJ

**TRUSTEE:**

The Mayor and Commonalty & Citizens of the City of London

**SENIOR MANAGEMENT:**

**Chief Executive**

John Barradell OBE - the Town Clerk and Chief Executive of the City of London Corporation

**Treasurer**

Dr Peter Kane - the Chamberlain of the City of London Corporation

**Solicitor**

Michael Cogher - the Comptroller and City Solicitor of the City of London Corporation

**AUDITORS:**

BDO LLP, 55 Baker Street, London, W1U 7EU

**BANKERS:**

Lloyds Bank Plc., P.O. Box 72, Bailey Drive, Gillingham Business Park, Kent ME8 0LS

**INVESTMENT FUND MANAGERS:**

Artemis Investment Management Limited, Cassini House, 57 St. James's Street, London, SW1A 1LD

Contact for the Chamberlain, to request copies of governance documents:

[PA-DeputyChamberlain@cityoflondon.gov.uk](mailto:PA-DeputyChamberlain@cityoflondon.gov.uk)

<b>Committee:</b> Board of Governors of the City of London Freeman's School	<b>Date:</b> 12 October 2020
<b>Subject:</b> Draft Annual Report and Financial Statements for the year ended 31 March 2020 for the City of London Freeman's School Bursary Fund	<b>Public</b>
<b>Report of:</b> The Chamberlain	<b>For Information</b>
<b>Report author:</b> Steven Reynolds, Chamberlain's Department	

## **Draft Annual Report and Financial Statements for the year ended 31 March 2020**

1. The draft 2019/20 Annual Report and Financial Statements for the City of London Freeman's School Bursary Fund (charity number: 284769) are attached.
2. During the year ended 31 March 2020 total funds increased by £49,134 to £1,031,876 (2018/19: total funds increased by £45,208 to £982,742). This movement comprised the following:
  - i) voluntary income of £257,984 (2018/19: £52,421);
  - ii) a net loss on investments of £203,790 (2018/19: a net loss on investments of £8,868);
  - iii) investment income of £37,137 (2018/19: £33,684); and
  - iv) expenditure on charitable activities of £41,797 consisting of four bursary awards (2018/19: expenditure on charitable activities of £32,029 consisting of four bursary awards) and £400 of other expenditure (2018/19: nil).
3. BDO LLP is auditing the draft Annual Report and Financial Statements, which will be submitted to the Finance Committee on 10 November 2020 for approval on behalf of the Court of Common Council.

## **Recommendation**

4. It is recommended that members receive this report for information.

## **Appendices**

- Appendix – The City of London Freeman's School Bursary Fund – Draft Annual Report and Financial Statements for the year ended 31 March 2020

**Contact**

Steven Reynolds, Group Accountant  
Chamberlain's Department

T: 020 7332 1382

E: [steven.reynolds@cityoflondon.gov.uk](mailto:steven.reynolds@cityoflondon.gov.uk)

# City of London Freemen's School Bursary Fund

Annual Report and Financial Statements for the  
year ended 31 March 2020

Charity registration number 284769

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## **ORIGINS OF THE CHARITY**

The City of London Freeman's School Bursary Fund charity was registered on 8 July 1982. It was previously governed by the governing document dated 30 April 1982 and its supplementary deeds of 25 August 1993 and 29 April 1997. The governing document and the supplementary deeds were replaced on 1 December 2011 by the governing scheme approved by The Charity Commission for England and Wales.

# **TRUSTEE'S ANNUAL REPORT**

## **STRUCTURE AND GOVERNANCE**

### **GOVERNING DOCUMENTS**

The governing document for the City of London Freeman's School Bursary Fund is the Scheme approved by The Charity Commission for England and Wales on 1 December 2011. This Scheme replaces the previous governing document dated 30 April 1982 and its supplementary deeds of 25 August 1993 and 29 April 1997.

### **GOVERNANCE ARRANGEMENTS**

The Mayor and Commonalty and Citizens of the City of London (also referred to as 'the City Corporation' or 'the City of London Corporation'), a body corporate and politic, is the Trustee of the City Of London Freeman's School Bursary Fund. The City Corporation is Trustee acting by the Court of Common Council of the City of London in its general corporate capacity and that executive body has delegated responsibility in respect of the administration and management of this charity to various committees and sub-committees of the Common Council, membership of which is drawn from 125 elected Members of the Common Council and external appointees to those committees. In making appointments to committees, the Court of Common Council will take into consideration any particular expertise and knowledge of the elected Members, and where relevant, external appointees. External appointments are made after due advertisement and rigorous selection to fill gaps in skills. Members of the Court of Common Council are unpaid and are elected by the electorate of the City of London.

The key Committee which has responsibility for directly managing matters related to the charity is the Board of Governors of the City of London Freeman's School, which is ultimately responsible to the Court of Common Council of the City of London. Committee meetings are held in public, enabling the decision-making process to be clear, transparent and publicly accountable. Details of the membership of Committees of the City Corporation are available at [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk).

The Trustee believes that good governance is fundamental to the success of the charity. A comprehensive review of governance commenced during the year and is ongoing to ensure that the charity is effective in fulfilling its objectives. Reference is being made to the good practices recommended within the Charity Governance Code throughout this review. Focus is being placed on ensuring regulatory compliance and the ongoing maintenance of an efficient and effective portfolio of charities that maximise impact for beneficiaries.



## **OBJECTIVES AND ACTIVITIES**

The objective of the charity is the promotion of education (including physical training) by the provision of bursaries and other forms of financial assistance for fees and / or other costs incurred through attendance at the School to enable pupils to further their education at the School by, for example, providing financial assistance to those who:

- (1) would not be able to enter the School having been accepted; or
- (2) having commenced education at the School would not be able to continue their education at the School.

Income can also be used for such other charitable purposes as shall be associated with the School, as the Trustee shall direct.

### **Investment Policy**

The charity's investments are held in units of the City of London Charities Pool (registered charity 1021138). The investment policy of the Charities Pool is to provide a real increase in annual income in the long term whilst preserving the value of the capital base. The annual report and financial statements of the Charities Pool (which include an analysis of investment performance against objectives set) are available from the Chamberlain of London, at the email address stated on page 24.

### **Policy on grant making**

The charity has established its grant making policies to achieve its objects, as laid out above, for the public benefit. Applications are assessed via a robust process to ensure the proposed activities for funding will be supported by adequate and appropriate resources and will be used only for activities that match the charity's criteria. The assessment, management and oversight of the charity's grant making is provided by the City Of London Freeman's School Bursary Fund, the Bursar and the Chamberlain's, which is an internal department of The City of London Corporation. Grants are recognised in the Statement of Financial Activities when they have been approved by the Trustee and notified to the Beneficiaries.

### **Public benefit statement**

The Trustee confirms that it has referred to the guidance contained in the Charity Commission's general guidance on public benefit when reviewing the City of London Freeman's School Bursary Fund's aims and objectives and in planning future activities. The purposes of the charity are as stated above.

Consequently, the Trustee considers that the City of London Freeman's School Bursary Fund operates to benefit the general public and satisfy the public benefit test.

## **REFERENCE AND ADMINISTRATIVE DETAILS**

The administrative details of the charity are stated on page 24.

## **ACHIEVEMENTS AND PERFORMANCE**

The target for 2019/20 was to continue to contribute towards fees of pupils at the City of London Freeman's School where financial hardship would cause the pupil to be unable to enter or continue at the School. In line with this, four bursaries (2018/19: four bursaries) were awarded during the year amounting to £41,110 (2018/19: £30,827).

## **PLANS FOR FUTURE PERIODS**

The objective for 2020/21 is to continue to contribute towards the tuition fees payable to the City of London Freeman's School for pupils who, but for financial assistance, would not be able to continue at or enter the School. Support for further pupils will likely be required in 2020/21 as a result the economic implications of the ongoing Coronavirus (COVID-19) pandemic.

Prior to the end of the financial year of the charity, the Coronavirus (COVID-19) pandemic began. This impacted on the value of the investments held by the charity and is expected to impact on the future level of income available to meet the objectives of the charity.

The Trustee is monitoring the situation and will continue with its operating model of only committing expenditure from available income funds. Where deemed necessary, future expenditure on charitable activities may be placed on hold until adequate investment income has been received.

# FINANCIAL REVIEW

## Overview of Financial Performance

### Income

In 2019/20 the charity's total income for the year was £295,121, an overall increase of £209,016 against the previous year (2018/19: total income for the year was £86,105, an overall increase of £47,424 against the previous year).

The key contributor to income was voluntary income, amounting to £257,984 (2018/19: £52,421), with further income from managed investments of £36,713 (2018/19: £33,113) and £424 (2018/19: £571) of interest from cash balances held.

The increase of £205,563 in voluntary income in 2019/20 is largely explained by a donation from the City of London Freemen's School of £100,000 from its Foundation Scholars Fund and non-recurrent legacy donations of £33,597 received in the year from one family. The latter was matched by the City of London Corporation, increasing the value of the donation to £67,194. The remainder of the increase, £38,369, was due to other miscellaneous donations received in 2019/20 and includes the match-funding received from the City of London Corporation relating to these donations.

### Expenditure

Total expenditure for the year was £42,197, of which £41,797 related to charitable activities and there was £400 of other expenditure (2018/19: £32,029 of expenditure, which all related to charitable activities).

### Investments performance

As at 31 March 2020, the investments held in the Charities Pool achieved a gross return of -14.78% (2018/19: 4.05%) compared to the FTSE All Share Index return of -18.45% (2018/19: 6.36%). Over three years this fund achieved a return of -2.44% (2018/19: 8.31%) compared to the FTSE All Share Index return of -4.24% (2018/19: 9.51%). Over five years, the fund achieved a return of 1.37% (2018/19: 6.77%) compared to the FTSE All Share Index return of 0.57% (2018/19: 6.10%).

Fund	2019/20		2018/19	
	3 year	5 year	3 year	5 year
Fund	-2.44%	1.37%	8.31%	6.77%
FTSE All Share	-4.24%	0.57%	9.51%	6.10%
Fund outperformance	+1.80%	+0.80%	-1.20%	+0.67%

### Funds held

The charity's total funds held increased by £49,134 (5.0%) to £1,031,876 as at 31 March 2020 (2018/19: total funds held increased by £45,208 (4.8%) to £982,742 as at 31 March 2019). This movement is comprised of income of £295,121 (2018/19: £86,105) less expenditure of £42,197 (2018/19: £32,029) and a loss of £203,790 (2018/19: a loss of £8,868) on the investments held within the City of London Charities

Pool based on valuations as at 31 March 2020. The valuations are linked to the UK stock market, which experienced a significant fall during February and March 2020 as a result of the Coronavirus (COVID-19) pandemic.

Funds are represented by expendable endowment funds which are held to generate income for the primary objectives of the charity. Any undistributed income is held for use in future years in accordance with the objectives of the charity.

The charity does not hold any unrestricted income funds.

Details of funds held, including their purposes, is set out within note 11 to the financial statements.

### **Reserves policy**

The reserves policy is to maintain the expendable funds of the charity in investments in the Charities Pool administered by the City of London Corporation and to use the investment income together with other funds, in accordance with the objectives of the charity.

### **Principal Risks and Uncertainties**

The charity is committed to a programme of risk management as an element of its strategy to preserve the charity's assets. In order to embed sound practice the senior leadership team ensures that risk management policies are applied, that there is an on-going review of activity and that appropriate advice and support is provided. A key risk register has been prepared for the charity, which has been reviewed by the Trustee. This identifies the potential impact of key risks and the measures which are in place to mitigate such risks.

## TRUSTEE RESPONSIBILITIES

The Trustee is responsible for preparing the Annual Report and the Financial Statements in accordance with applicable law and regulations.

Charity law requires the Trustee to prepare the financial statements for each financial year in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). Under charity law the Trustee must not approve the financial statements unless the Trustee is satisfied that they give a true and fair view of the state of affairs of the charity and of the incoming resources and application of resources, including the income and expenditure, of the charity for that period. In preparing these financial statements, the Trustee is required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- state whether applicable UK Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements; and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the charity will continue in business.

The Trustee is responsible for keeping adequate accounting records that are sufficient to show and explain the charity's transactions and disclose with reasonable accuracy at any time the financial position of the charity and enable the Trustee to ensure that the financial statements comply with the Charities Act 2011. The Trustee is also responsible for safeguarding the assets of the charity and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

In so far as the Trustee is aware:

- there is no relevant audit information of which the charity's auditors are unaware; and
- the Trustee has taken all steps that they ought to have taken to make themselves aware of any relevant audit information and to establish that the auditors are aware of that information.

Financial statements are published on the Trustee's website in accordance with legislation in the United Kingdom governing the preparation and dissemination of financial statements, which may vary from legislation in other jurisdictions. The maintenance and integrity of the Trustee's website is the responsibility of the Trustee. The Trustee's responsibility also extends to the ongoing integrity of the financial statements contained therein.

Adopted and signed for on behalf of the Trustee.

Jeremy Paul Mayhew MA MBA  
Chairman of Finance Committee of  
The City of London Corporation  
Corporation  
Guildhall, London  
XX Month 2020

Jamie Ingham Clark FCA  
Deputy Chairman of Finance  
Committee of The City of London

# **INDEPENDENT AUDITOR'S REPORT TO THE TRUSTEE OF CITY OF LONDON FREEMEN'S SCHOOL BURSARY FUND**

## **Opinion**

We have audited the financial statements of the City of London School Bursary Fund incorporating City of London School Scholarships and Prizes Fund (the charity) for the year ended 31 March 2020 which comprise the statement of financial activities, the balance sheet and notes to the financial statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 The Financial Reporting Standard applicable in the UK and Republic of Ireland (United Kingdom Generally Accepted Accounting Practice).

In our opinion, the financial statements:

- give a true and fair view of the state of the charity's affairs as at 31 March 2020 and of its incoming resources and application of resources for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Charities Act 2011.

## **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the charity in accordance with the ethical requirements relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## **Conclusions related to going concern**

We have nothing to report in respect of the following matters in relation to which the ISAs (UK) require us to report to you where:

- the Trustee's use of the going concern basis of accounting in the preparation of the financial statements is not appropriate; or
- the Trustee have not disclosed in the financial statements any identified material uncertainties that may cast significant doubt about the charity's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from the date when the financial statements are authorised for issue.

## **Other information**

The other information comprises the information included in the Annual Report, other than the financial statements and our auditor's report thereon. The Trustee is responsible for the other information.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

## **Matters on which we are required to report by exception**

We have nothing to report in respect of the following matters in relation to which the Charities Act 2011 requires us to report to you if, in our opinion;

- the information contained in the financial statements is inconsistent in any material respect with the Trustee's Annual Report; or
- adequate accounting records have not been kept; or
- the financial statements are not in agreement with the accounting records and returns; or
- we have not received all the information and explanations we require for our audit.

## **Responsibilities of the Trustee**

As explained more fully in the Trustee's responsibilities statement, the Trustee is responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the Trustee determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Trustee is responsible for assessing the charity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Trustee either intend to liquidate the charity or to cease operations, or have no realistic alternative but to do so.



## **Auditor's responsibilities for the audit of the financial statements**

We have been appointed as auditor under section 144 of the Charities Act 2011 and report in accordance with the Act and relevant regulations made or having effect thereunder.

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is located at the Financial Reporting Council's ("FRC's") website at:

<https://www.frc.org.uk/auditorsresponsibilities>.

This description forms part of our auditor's report.

## **Use of our report**

This report is made solely to the charity's Trustee, as a body, in accordance with the Charities Act 2011. Our audit work has been undertaken so that we might state to the charity's Trustee those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the charity and the charity's Trustee as a body, for our audit work, for this report, or for the opinions we have formed.

Fiona Condrón (Senior Statutory Auditor)  
For and on behalf of BDO LLP, statutory auditor  
London

Date

BDO LLP is eligible for appointment as auditor of the charity by virtue of its eligibility for appointment as auditor of a company under section 1212 of the Companies Act 2006.

BDO LLP is a limited liability partnership registered in England and Wales (with registered number OC305127).

**STATEMENT OF FINANCIAL ACTIVITIES****FOR THE YEAR ENDED 31 MARCH 2020**

	Notes	2019/20 Endowment Funds £	2018/19 Endowment Funds £
<b>Income and endowments from:</b>			
Voluntary income	2	<b>257,984</b>	52,421
Investments	3	<b>37,137</b>	33,684
<b>Total income</b>		<b>295,121</b>	86,105
<b>Expenditure on:</b>			
Charitable activities	4	<b>41,797</b>	32,029
Other	5	<b>400</b>	-
<b>Total expenditure</b>		<b>42,197</b>	32,029
Net gains/(losses) on investments	11	<b>(203,790)</b>	(8,868)
<b>Net movement in funds</b>		<b>49,134</b>	45,208
<b>Reconciliation of funds:</b>			
Total funds brought forward	10, 11	<b>982,742</b>	937,534
<b>Total funds carried forward</b>	10, 11	<b>1,031,876</b>	982,742

All of the above results are derived from continuing activities.

There were no other recognised gains and losses other than those shown above.

The notes on pages 16 to 23 form part of these financial statements.

**BALANCE SHEET****AS AT 31 MARCH 2020**

	<b>Notes</b>	<b>2020 Total £</b>	<b>2019 Total £</b>
<b>Fixed assets:</b>			
Investments	8	<b>850,427</b>	911,850
<b>Total fixed assets</b>		<b>850,427</b>	911,850
<b>Current assets</b>			
Cash at bank and in hand		<b>195,152</b>	82,369
<b>Total current assets</b>		<b>195,152</b>	82,369
<b>Creditors: Amounts falling due within one year</b>	9	<b>(13,703)</b>	(11,477)
<b>Net current assets / (liabilities)</b>		<b>181,449</b>	70,892
<b>Total net assets</b>	10, 11	<b>1,031,876</b>	982,742
<b>The funds of the charity:</b>			
Endowment funds	10, 11	<b>1,031,876</b>	982,742
<b>Total funds</b>	10, 11	<b>1,031,876</b>	982,742

The notes on pages 16 to 23 form part of these financial statements

Approved and signed on behalf of the Trustee.

Dr Peter Kane

Chamberlain of London

XX Month 2020

## NOTES TO THE FINANCIAL STATEMENTS

### 1. ACCOUNTING POLICIES

The following accounting policies have been applied consistently in dealing with items that are considered material in relation to the financial statements of the charity.

#### (a) Basis of preparation

The financial statements of the charity, which is a public benefit entity under FRS102, have been prepared under the historical cost convention and in accordance with the Statement of Recommended Practice (SORP) Accounting and Reporting by Charities, published in 2015, Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (FRS 102) and the Charities Act 2011.

#### (b) Going concern

The financial statements have been prepared on a going concern basis as the Trustee considers that there are no material uncertainties about the charity's ability to continue as a going concern. The charity only spends the income that is generated from donations and investments, so maintaining its capital base. The latest forecast anticipates that adequate funds will be available in the next five years to enable the charity to continue to fulfil its obligations.

In making this assessment, the Trustee has considered the potential impact of the Coronavirus (COVID-19) pandemic on the value of investment assets held, future income levels and the liquidity of the charity over the next 12-month period. The policy of only approving expenditure commitments from available income provides the flexibility to ensure the long-term viability of the charity despite reductions in investment values that have occurred. For this reason, the Trustee continues to adopt a going concern basis for the preparation of the financial statements.

#### (c) Key management judgements and assumptions

The preparation of the financial statements requires management to make judgements, estimates and assumptions that affect the application of policies and reported amounts of assets and liabilities, income and expenditure. The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances, the result of which form the basis of decisions about carrying values of assets and liabilities that are not readily apparent from other sources. The resulting accounting estimates will, by definition, seldom equal the related actual results.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised and in any future periods affected. Management do not consider there to be any material revisions requiring disclosure.

**(d) Statement of Cash Flows**

The charity has taken advantage of the exemption in FRS102 (paragraph 1.12b) from the requirements to produce a statement of cash flows on the grounds that it is a small entity.

**(e) Income**

All income is included in the Statements of Financial Activities (SOFA) when the charity is legally entitled to the income; it is more likely than not that economic benefit associated with the transaction will come to the charity and the amount can be quantified with reasonable certainty. Income consists of donations, investment income and interest.

**(f) Expenditure**

Expenditure is accounted for on an accruals basis and has been classified under the principal category of 'expenditure on charitable activities'. Liabilities are recognised as expenditure as soon as there is a legal or constructive obligation committing the charity to that expenditure, it is probable that settlement will be required, and the amount of the obligation can be measured reliably.

The charity does not employ any staff. Officers of the City Corporation provide administrative assistance to the charity when required, but this is not considered material and is not separately calculated by the City Corporation. It is consequently not possible to quantify this assistance within expenditure in the Statement of Financial Activities.

**(g) Taxation**

The charity meets the definition of a charitable trust for UK income tax purposes, as set out in Paragraph 1 Schedule 6 of the Finance Act 2010. Accordingly, the charity is exempt from UK taxation in respect of income or capital gains under part 10 of the Income Tax Act 2007 or section 256 of the Taxation of Chargeable Gains Act 1992, to the extent that such income or gains are applied exclusively to charitable purposes.

**(h) Investments**

Investments are made in the City of London Charities Pool (charity number 1021138) which is an investment mechanism operating in a similar way to a unit trust. This enables the City of London Corporation to "pool" small charitable investments together and consequently obtain better returns than would be the case if investments were made individually.

Investments were previously valued at mid-price. To ensure compliance with FRS102, bid-price is now used. The difference in valuation as a result in the year is considered immaterial. Gains and losses for the year on investments held as fixed assets are included in the Statement of Financial Activities.

**(i) Funds structure**

Income, expenditure and gains / losses are allocated to the **expendable endowment fund**. This consists of funds that are expendable as a result of the charity's governing scheme. Funds can also be invested to generate income which can be spent on the charitable purpose of the charity.

**(j) Insurance**

The charity, elected Members and staff supporting the charity's administration are covered by the City Corporation's insurance liability policies, and otherwise under the indemnity the City Corporation provides to Members and staff, funded from City's Cash.

**2. INCOME FROM VOLUNTARY ACTIVITIES**

	<b>Endowment funds 2019/20 £</b>	<b>Endowment funds 2018/19 £</b>
Donations and legacies	<b>178,992</b>	26,211
City of London Corporation match-funding	<b>78,992</b>	26,210
<b>Total</b>	<b>257,984</b>	52,421

The City of London Corporation match-funds external donations received up to the value of 2.5% of the school's tuition fee income in any one financial year.

**3. INCOME FROM INVESTMENTS**

	<b>Endowment funds 2019/20 £</b>	<b>Endowment funds 2018/19 £</b>
Investment income	<b>36,713</b>	33,113
Interest	<b>424</b>	571
<b>Total</b>	<b>37,137</b>	33,684

#### 4. EXPENDITURE ON CHARITABLE ACTIVITIES

		Endowment funds	
	Direct costs	Support costs	Total
2019/20	£	£	2019/20 £
Bursaries awarded	41,110	687	<b>41,797</b>

		Endowment funds	
	Direct costs	Support costs	Total
2018/19	£	£	2018/19 £
Bursaries awarded	30,827	1,202	32,029

Charitable activities consisted of four bursaries awarded to individuals (2018/19: four bursaries were awarded to individuals).

#### 5. OTHER EXPENDITURE

	Endowment funds	Endowment funds
	2019/20 £	2018/19 £
Professional fees	<b>400</b>	-

#### 6. AUDITOR'S REMUNERATION

BDO are the auditors of the City of London's City's Cash Fund and all of the different charities of which it is Trustee. The City of London Corporation charges the audit fee to its City's Cash Fund and does not attempt to apportion the audit fee between the different charities. No other services were provided to the charity by its auditors during the year (2018/19: nil).

## 7. TRUSTEE EXPENSES

The members of the City of London Corporation acting on behalf of the Trustee did not receive any remuneration or reimbursement of expenses during 2019/20 (2018/19: nil).

## 8. INVESTMENTS

The investments are held in the City of London Corporation Charities Pool, a charity registered in the UK with the Charities Commission (charity number 1021138). The Charities Pool is a UK registered unit trust.

The value of investments held by the charity are as follows:

	<b>Total 31 March 2020 £</b>	<b>Total 31 March 2019 £</b>
Market value 1 April	<b>911,850</b>	901,815
Additions	<b>142,367</b>	18,903
(Loss) for the year	<b>(203,790)</b>	(8,868)
<b>Market value 31 March</b>	<b>850,427</b>	911,850
<b>Cost 31 March</b>	<b>763,469</b>	621,103
Units held in Charities Pool	<b>119,829</b>	104,570

The type of listed investments held as at 31 March was as follows:

	<b>Total 31 March 2020 £</b>	<b>Total 31 March 2019 £</b>
Equities	<b>755,179</b>	808,811
Pooled Units	<b>61,231</b>	62,006
Cash held by Fund Manager	<b>34,017</b>	41,033
<b>Total</b>	<b>850,427</b>	911,850

A loss of £203,790 (2018/19: £8,868) occurred on investments, based on valuations as at 31 March 2020. The valuations are linked to the UK stock market, which experienced a significant fall during February and March 2020 as a result of the Coronavirus (COVID-19) pandemic.



**9. CREDITORS – AMOUNTS DUE WITHIN ONE YEAR**

	<b>Total 31 March 2020 £</b>	<b>Total 31 March 2019 £</b>
Bursaries awarded	<b>13,703</b>	11,477

**10. ANALYSIS OF NET ASSETS BY FUND**

	<b>Endowment funds</b>	
<b>At 31 March 2020</b>	<b>Total 31 March 2020 £</b>	<b>Total 31 March 2019 £</b>
Fixed assets - investments	<b>850,427</b>	911,850
Current assets	<b>195,152</b>	82,369
Current liabilities	<b>(13,703)</b>	(11,477)
<b>Total</b>	<b>1,031,876</b>	982,742

	<b>Endowment funds</b>	
<b>At 31 March 2019</b>	<b>Total 31 March 2019 £</b>	<b>Total 31 March 2018 £</b>
Fixed assets - investments	911,850	901,815
Current assets	82,369	43,028
Current liabilities	(11,477)	(7,309)
<b>Total</b>	982,742	937,534

## 11. MOVEMENT IN FUNDS

<b>At 31 March 2020</b>	Total 1 April 2019 £	Income £	Expendit- ure £	Gains & (losses) £	Total 31 March 2020 £
Endowment funds:					
Expendable endowment	982,742	295,121	(42,197)	(203,790)	<b>1,031,876</b>
<b>Total funds</b>	<b>982,742</b>	<b>295,121</b>	<b>(42,197)</b>	<b>(203,790)</b>	<b>1,031,876</b>

<b>At 31 March 2019</b>	Total 1 April 2018 £	Income £	Expendit- ure £	Gains & (losses) £	Total 31 March 2019 £
Endowment funds:					
Expendable endowment	937,534	86,105	(32,029)	(8,868)	982,742
<b>Total funds</b>	<b>937,534</b>	<b>86,105</b>	<b>(32,029)</b>	<b>(8,868)</b>	<b>982,742</b>

A loss of £203,790 (2018/19: £8,868) occurred on investments, based on valuations as at 31 March 2020. The valuations are linked to the UK stock market, which experienced a significant fall during February and March 2020 as a result of the Coronavirus (COVID-19) pandemic.

### Purpose of endowment funds

The permanent endowment fund is held in perpetuity as a capital fund to generate income for the activities of the charity and represents the original assets of the charity, reported at current market value. Any income from this fund is accounted for within unrestricted income funds.

## 12. RELATED PARTY TRANSACTIONS

The City Corporation is the sole Trustee of the charity, as described on page 2.

The charity is required to disclose information on related party transactions with bodies or individuals that have the potential to control or influence the charity. Members are required to disclose their interests, and these can be viewed online at [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk).

Members and senior staff are requested to disclose all related party transactions, including instances where their close family has made such transactions.

Figures in brackets represent the amounts due at the balance sheet date.

Related party	Connected party	2019/20 £	2018/19 £	Detail of transaction
City of London Corporation	The Trustee of the charity	<b>78,992</b>	26,210	Match-funding up to a maximum of 2.5% of tuition fee income
City of London Corporation	The Trustee of the charity	<b>36,713</b>	33,113	Distribution from the Charities Pool
City of London Corporation	The Trustee of the charity	<b>(687)</b>	(1,202)	Bursary administration costs

## REFERENCE AND ADMINISTRATION DETAILS

**CHARITY NAME:** City of London Freemen's School Bursary Fund

Registered charity number: 284769

**PRINCIPAL OFFICE OF THE CHARITY & THE CITY CORPORATION:**

Guildhall, London, EC2P 2EJ

**TRUSTEE:**

The Mayor and Commonalty & Citizens of the City of London

**SENIOR MANAGEMENT:**

**Chief Executive**

John Barradell OBE - The Town Clerk and Chief Executive of the City of London Corporation

**Treasurer**

Dr Peter Kane - The Chamberlain of the City of London Corporation

**Solicitor**

Michael Cogher - The Comptroller and City Solicitor of the City of London Corporation

**AUDITORS:**

BDO LLP, 55 Baker Street, London, W1U 7EU

**BANKERS:**

Lloyds Bank Plc., P.O. Box 72, Bailey Drive, Gillingham Business Park, Kent ME8 0LS

**INVESTMENT FUND MANAGERS:**

Artemis Investment Management Limited, Cassini House, 57 St. James's Street, London, SW1A 1LD

Contact for The Chamberlain, to request copies of governance documents:

[PA-DeputyChamberlain@cityoflondon.gov.uk](mailto:PA-DeputyChamberlain@cityoflondon.gov.uk)

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