

	Policy Name: <b>Child Protection Policy</b>
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## Contents

1. INTRODUCTION	2
2. LEGAL FRAMEWORK	2
3. ROLES AND RESPONSIBILITIES	3
4. CHILD PROTECTION AND SAFEGUARDING PROCEDURE	3
<b>WHAT ACTION TO TAKE IF YOU HAVE CONCERNS ABOUT A CHILD WHO MAY BE AT RISK</b>	<b>4</b>
5. DISCLOSURE: WHAT TO DO IF A CHILD DISCLOSES ABUSE	5
6. WHISTLE-BLOWING	6
7. MISSING PUPILS	6
8. CATEGORIES OF ABUSE	6
9. SAFEGUARDING AND THE PREVENT DUTY	8
10. MANAGING ALLEGATIONS OF ABUSE MADE AGAINST STAFF AND VOLUNTEERS	9
11. RECORD KEEPING	10
12. SAFER RECRUITMENT	11
13. STAFF INDUCTION, TRAINING AND DEVELOPMENT	12
14. CONFIDENTIALITY AND INFORMATION SHARING	13
15. INTER-AGENCY WORKING	13
16. SUPPORTING PUPILS	13
17. CONTRACTORS, SERVICE AND ACTIVITY PROVIDERS AND WORK PLACEMENT PROVIDERS	14
18. SITE SECURITY	14
19. QUALITY ASSURANCE	15
20. POLICY REVIEW	15
21. LINKED POLICIES AND PROCEDURES	15
Annex A THE ROLE OF THE DESIGNATED CHILD PROTECTION OFFICER	17
Annex B TERMS OF REFERENCE FOR NOMINATED SAFEGUARDING GOVERNOR	20
Annex C PROCEDURE FOR MANAGING ALLEGATIONS OF ABUSE MADE AGAINST SCHOOL STAFF MEMBERS	23

**The School will never ignore an allegation of child abuse  
and will always investigate any concerns thoroughly.**

**All Staff have a duty to report any concerns of serious harm or abuse.**

## **1 INTRODUCTION**

- 1.1 The safety and well-being of all pupils at Mayfield School is our highest priority. Safeguarding children is everyone's responsibility; all those directly connected with our community, staff members, governors, parents, families and pupils, have an essential role in making it safe and secure. The governing body will ensure that the School safeguards and promotes the welfare of pupils, and work together with other agencies to ensure that our School has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.
- 1.2 Cornelia Connelly, foundress of the Society of the Holy Child Jesus, 'developed an educational system based on trust and reverence for the dignity of every human being'. It is our priority to know every girl as an individual and to provide a secure and caring environment, so that she can learn and develop in safety. We expect respect, good manners and fair play to be embraced by everyone so that every girl can fulfil her potential and feel positive about herself as an individual. All girls should care for and support each other.
- 1.3 This policy applies to all members of staff in the School, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers, who all have a full and active part to play in protecting our pupils from harm.
- 1.4 In line with the law, this policy defines a child as anyone under the age of 18 years.
- 1.5 The School's Child Protection Policy follows the guidance and procedures of the East Sussex Safeguarding Children Board.

As a significant number of our girls are resident in Kent, and domestic boarders live in a range of authorities across the country, we would also follow correct procedure and raise any concerns with the home authority of the individual girl. Should the concern be regarding a girl whose main residence is overseas we would contact East Sussex.

- 1.6 This policy has been written in accordance with locally agreed inter-agency procedures and is available on the School website.

## **2 LEGAL FRAMEWORK**

- 2.1 Section 157 of the Education Act 2002 places a duty on governing bodies of Independent Schools to make arrangements for ensuring that their functions relating to the conduct of the School are exercised with a view to safeguarding and promoting the welfare of those children who are pupils at the School.
- 2.2 Under section 10 of the Children Act 2004, all Schools, including Independent Schools, are required to cooperate with the local authority to improve the well-being of children in the local authority area.
- 2.3 Under section 14B of the Children Act 2004, the Local Safeguarding Children Board can require a School to supply information in order to perform its functions. This must be complied with.

- 2.4 This policy and the accompanying procedures have been developed in accordance with the following statutory guidance and local safeguarding procedures:
- Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, March 2015
  - *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016*
  - *Pan-Sussex Child Protection and Safeguarding Procedures*

### 3 ROLES AND RESPONSIBILITIES

- 3.1 The School's lead person with overall responsibility for child protection and safeguarding is the **Child Protection Officer** (Sarah Ryan, Deputy Head). We have a Deputy Child Protection Officer (Jodi Stone, Head of Middle School) to ensure there is appropriate cover for this role at all times. The Child Protection Officer's responsibilities are described in Appendix A.
- 3.2 The School has a **Nominated Governor** (Sara Hulbert-Powell) responsible for safeguarding to ensure good practice, to liaise with the Child Protection Officer and to report to the governing body on Safeguarding issues.
- 3.3 The Headmistress is the person to whom **allegations** of abuse made against School staff members should be reported. She would then be the School's case liaison for the LADO. The Chairman of Governors is the person to whom allegations against the Headmistress should be reported. Additionally, allegations against Governors should be made to the Chairman of Governors unless the allegation is against the Chairman in which case it should be referred to the Chairman of the Governance Committee.
- 3.4 The **Headmistress** will ensure that the policies and procedures are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.
- 3.5 The **Governing body** and SMT are responsible for ensuring that safeguarding arrangements are fully embedded within the School's ethos and reflected in the School's day-to-day practice.
- 3.6 **All staff members, governors, volunteers and external providers** are trained in how to recognise signs and symptoms of abuse, how to respond to girls who disclose abuse and what to do if they are concerned about a child.

### 4. CHILD PROTECTION AND SAFEGUARDING PROCEDURE

- 4.1 **Keeping Children Safe In Education September 2016 states clearly that** All School and college staff have a responsibility to provide a safe environment in which children can learn and that all School and college staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.
- 4.2 Children who are at risk of abuse and significant harm should immediately be referred to Children's Social Care. In other cases where girls are in need of support for significant other agencies may be

involved such as Targeted Youth Services, CAMHS or the School Doctor. Examples of such need might include instances of self-harm, eating disorders, mental health difficulties, attempted suicide. The Child Protection Officer would refer to the East Sussex Continuum of Need to make an initial decision which agency to contact, or contact the local Duty and Assessment Team for advice if there is any lack of clarity. The School's welfare procedures mean that any girl who is in need is monitored from the early signs of need so that appropriate help and support is provided both internally and from external sources when appropriate. Staff in the School complete Cause for Concern forms for any issue of either serious risk or significant need so that appropriate action is taken and recording and monitoring occurs. For further information see: the School's Mental Health Policy

- 4.3 The School has developed a structured procedure in line with [Pan-Sussex Child Protection and Safeguarding Procedures](#) which will be followed by all members of the School community in cases of suspected abuse.

#### WHAT ACTION TO TAKE IF YOU HAVE CONCERNS ABOUT A CHILD WHO MAY BE IN NEED OR AT RISK

1. Discuss your concerns with the Designated Child Protection Officer, Sarah Ryan, or in her absence, with the Deputy Designated Child Protection Officer, Jodi Stone, <b>as soon as possible, before a girl leaves to go home.</b> It is important that the girl is not sent home without taking the right protective action.
2. Complete the <b>Cause for Concern Form</b> and pass it to the Child Protection Officer (available in electronic form on the J Drive – Pastoral folder, or in hard copy in the Working Staffroom). Copies may also be requested in either format from reception.
3. If the Child Protection Officer or her Deputy is not available, you should contact the Headmistress, if she is not available you should contact Children's Social Care Duty and Assessment Team yourself for a consultation about the action you need to take. Inform the Child Protection Officer about your consultation and what actions you have taken.
<b>REMEMBER: ANYONE CAN MAKE A REFERRAL DIRECTLY TO CHILDREN'S SOCIAL CARE IF THEY ARE CONCERNED THAT A CHILD IS AT RISK</b>

#### Details for Key Internal and External Contacts

<b>Internal</b>
Child Protection Officer: Sarah Ryan <b>01435 874606 (ext 234)</b> <a href="mailto:sryan@mayfieldgirls.org">sryan@mayfieldgirls.org</a>
Deputy Child Protection Officer: Jodi Stone <b>01435 873629 (ext 286)</b> <a href="mailto:jstone@mayfieldgirls.org">jstone@mayfieldgirls.org</a>
Headmistress: Antonia Beary: <b>01435 87460 (ext 264)</b> <a href="mailto:headmistress@mayfieldgirls.org">headmistress@mayfieldgirls.org</a>
Nominated Governor for Safeguarding: Sara Hulbert-Powell <b>07980 934404</b>

## External

If you are concerned that a child or young person is at significant risk of harm, contact the **East Sussex Children's Services' Single Point of Advice (SPOA)**- (which provides screening triage for the Duty and Assessment Team, Early Help Services, Police and other relevant agencies working in Children's Services).- Initially contact is made with East Sussex, as this is where the School is located and they should be able to advise and take any necessary immediate action or give advice in an emergency situation.

### SPOA

Phone: **01323 464222**

e-mail: [0-19.SPOA@eastsussex.gov.uk](mailto:0-19.SPOA@eastsussex.gov.uk)

For immediate concerns **out of office hours** the Emergency Duty Team should be contacted on:  
01273 335906 or 01273 335905

### Local Authority Designated Officer (LADO)

(Responsible for managing allegations against adults who work, volunteer or care (e.g. foster carers) for children)

**Amanda Glover**

Phone: **07825 782793**

- 4.4 If you have concerns that a child or young person is being drawn into extremist activity (see Section 17 'Safeguarding and the Prevent Duty' below) referrals should be made via the SPOA as for all other safeguarding concerns.

## 5 WHAT TO DO IF A CHILD DISCLOSES ABUSE

- 5.1 If a child discloses that he or she has been abused in some way, the member of staff or volunteer should follow this guidance:

- Listen to what is being said without displaying shock or disbelief.
- Only ask questions when necessary to clarify.
- Allow the child to talk freely – do not put words in the child's mouth or ask leading questions.
- Reassure the child that what has happened is not his or her fault.
- Do not make promises that you may not be able to keep.
- **Do not promise confidentiality** – it may be necessary to refer the child to Children's Social Care.
- Stress that it was the right thing to tell.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told.
- Inform the Child Protection Officer without delay.
- Complete the Cause for Concern Form and pass it to the Child Protection Officer.
- Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the Child Protection Officer.

- 5.2 In line with the procedures, the relevant Children's Services Duty and Assessment Team will be notified as soon as there is a significant concern.
- 5.3 The name of the Child Protection Officer is clearly advertised in the School, with a statement explaining the School's role in referring and monitoring cases of suspected abuse.
- 5.4 We ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children by publishing the policy and procedures on our website and by referring to them in our introductory School materials.

## 6 WHISTLE-BLOWING

- 6.1 All staff members are made aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary, they should speak with the Headmistress or the Chairman of the Governing body. They may also raise any concerns regarding this directly to the Local Authority Designated Officer (LADO): **Amanda Glover 07825 782793**
- 6.2 The ability to raise a complaint or concern in good faith, is of paramount importance, and doing so would be in no way prejudicial to the position of a member of staff within the School. See the School's Whistleblowing Policy for further detail and advice.
- 6.3 We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice.

## 7 MISSING PUPILS

- 7.1 The School has a specific procedure for following up any girl missing from School. (See Missing Pupil Policy).
- 7.2 In line with East Sussex procedures if a girl has been out of any educational provision for a substantial period of time (usually four weeks or more as stipulated in the East Sussex CME Guidelines), we would notify the local Child Missing Education Office.

Children Missing Education, St Mark's House, 14 Upperton Road, Eastbourne BN27 2JQ

Phone: **01323 464 373**

Email: [cme@eastsussex.gov.uk](mailto:cme@eastsussex.gov.uk)

## 8 CATEGORIES OF ABUSE

- 8.1 **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development. It may involve:

- making a child feel worthless, unloved or inadequate
- only there to meet another's needs
- inappropriate age or developmental expectations
- overprotection and limitation of exploration, learning and social interaction
- seeing or hearing the ill treatment of another, e.g. domestic abuse
- making the child feel worthless and unloved - high criticism and low warmth
- serious bullying
- exploitation or corruption

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

**Neglect** is the persistent failure to meet a child's basic physical 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 misuse. Once a child is born, it may involve a parent 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.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. Activities may involve physical contact, including penetration of any part of the body, or non-penetrative acts. They may include non-contact activities, such as involving children looking at or in the production of sexual images, including on the internet, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

## 8.2 Potentially Abusive peer relationships

Bullying behaviour is damaging and may lead to abuse; there is also the possibility that relationships between students are abusive and that both perpetrator and victim might be 'at risk'. Pupils and staff should be alert to these possibilities and where there is reasonable cause to suspect a child is suffering the School would refer to the Duty and Assessment team.

### 8.3 Specific Safeguarding Issues

School staff members need to be aware of specific safeguarding issues and be alert to any risks. Chapter 8 of the [Pan-Sussex Child Protection and Safeguarding Procedures](#) has detailed information about specific issues such as child sexual exploitation, fabricated or induced illness, female genital mutilation, private fostering, etc., and the local procedures to respond to risks.

The government website, [GOV.UK](#), has broad government guidance on a variety of issues. The following is not a comprehensive list and staff members should search the GOV.UK website and the *Pan-Sussex Procedures* for advice on other issues.

- [bullying, including cyberbullying](#)
- [child sexual exploitation](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation](#)
- [gangs and youth violence](#)
- [trafficking](#)

#### Female Genital Mutilation

As outlined in *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016* from October 2015 it is a statutory duty for teachers (along with social workers and healthcare professionals) to report to the police where they discover, either through disclosure from the victim or through visual evidence, that FGM appears to have been carried out on a girl under 18. This would be referred to the local police who can be contacted by phone on 101, but advice will also be sought from the Duty and Assessment team (contact details above).

## 9 SAFEGUARDING AND THE PREVENT DUTY

- 9.1 Fundamental to our ethos is the promotion of the value and dignity of all human life, and mutual understanding and respect between all people. We actively encourage pupils always to respect the values of democracy, the rule of law, individual liberty and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the School and where political issues are brought to the attention of pupils reasonable steps are taken to offer a balanced presentation of opposing views.
- 9.2 We value freedom of speech and the expression of beliefs as fundamental human rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege: it is subject to laws and policies governing equality, human rights, community safety and community cohesion. We seek to protect our pupils against the messages of all violent extremism including, but not restricted to, those linked to extremist Islamic ideology, Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

- 9.3 Our priority of pastoral care ensures detailed knowledge and monitoring of individual pupils. We are mindful of external influences and watchful for changes in behaviour and attitude. As a School with a diverse cross-section of pupils from different cultures, religions and socio-economic backgrounds we actively encourage and develop mutual respect and support.
- 9.4 The School works to ensure pupils and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments, through a range of processes within the School's curriculum including tutor programmes, assemblies, the RS and History curriculums and Life Skills and activities such as debating and public speaking. The duty to protect children from radicalisation is consistent with the Safeguarding processes outlined in this policy. Staff are alert to changes in girl's behaviour which could indicate that they may be in need of help or protection; using their professional judgement in identifying girls who may be at risk and acting proportionately. Senior pastoral staff undertake the online general awareness training from Channel and staff are regularly briefed on all safeguarding concerns in on-going staff inset training.
- 9.5 The School annually assesses the risk of pupils and staff being drawn into terrorism using the audit toolkit provided by East Sussex County Council, and takes note of the updated contextual information provided by the local authority to respond better to the specific risks in our local area. The School follows the latest government guidelines in ensuring that best practice is observed in regard to this important issue (currently *The Prevent duty* DfE June 2015). The School would always follow Local Authority and Channel procedures for reporting concerns. The initial response is to contact the East Sussex Children's Services via the SPOA. The Sussex police constitute part of this team and would provide further guidance in such cases.

## **10 MANAGING ALLEGATIONS OF ABUSE MADE AGAINST STAFF AND VOLUNTEERS**

- 10.1 The School takes seriously all allegations of abuse made against staff members, including volunteers, and will investigate them in line with the statutory guidance, Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016, and the [Pan-Sussex Child Protection and Safeguarding Procedures](#).
- 10.2 In addition to this outline of the process more detailed guidance for the Case Manager is given in Annex B which should be followed carefully to ensure appropriate action is taken throughout the proceedings.
- 10.3 **The procedure applies to all adults working in the School or providing a service on behalf of the School to our pupils either within or outside School premises**, i.e. all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers (**collectively referred to as staff or staff members** in this procedure).
- 10.4 The allegations management procedure will be used in all cases where it is alleged that a staff member, has:
- behaved in a way that has harmed a child, or may have harmed a child; or
  - possibly committed a criminal offence against or related to a child; or
  - behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children.

#### 10.5 Roles and responsibilities:

- Anyone who has concerns about, or has received an allegation about, the behaviour of a staff member needs to report the concerns immediately to the Headmistress. In the absence of the Headmistress, or if the Headmistress is the subject of the allegation, concerns must be reported to the Chairman of Governors, **without informing the Head** (contact information for the Chairman of Governors can be obtained from the Bursar). If both the Headmistress and the Chairman of Governors are absent, the allegation needs to be reported to the East Sussex Children's Services via the SPOA
- The Headmistress will act under the instruction of the LADO and ensure that his/her recommendations and requirements regarding the handling of the case are implemented.
- The Chairman of Governors will undertake the same role, if the allegation is made against the Headmistress.

10.6 The School also has a duty of care to its employees and will provide appropriate support for anyone facing an allegation. A person will not be automatically suspended in the case of an allegation. This would only happen in extremely serious cases or where there is cause to suspect a child or other children at the School are at risk of harm. Where possible, alternative arrangements would be considered in line with the guidance in Keeping Children Safe in Education September 2016. If an employee is suspended they will be provided with a named contact at the School. The School is mindful of the need for any allegation to be dealt with quickly in a way which provides protection for the child but also to support the person who is the subject of the allegation.

10.7 If a member of boarding staff is suspended during the investigation of an allegation against them, then alternative accommodation off site will be provided for them during the period of the suspension.

10.8 The allegation will be investigated according to procedure, even if the accused staff member resigns or ceases to provide their services. The School will not use 'compromise/settlement agreements', for example where the staff member agrees to resign provided that disciplinary action is not taken and that a future reference is agreed.

### 11 RECORD KEEPING

11.1 All child protection and welfare concerns are recorded and kept in line with the LSCB protocols. The Child Protection Officer will ensure that records are maintained appropriately for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance. Such files with those of girls with significant pastoral concerns of a sensitive nature, confidential files are kept on the individual girls in question and these are kept in the locked and fire-proof safe in the Headmistress' office.

11.2 We continue to support any pupil leaving the School, about whom there have been concerns, by ensuring that all appropriate information, including child protection and welfare concerns, is forwarded under confidential cover to the pupil's new School as a matter of priority.

## 12 SAFER RECRUITMENT

12.1 All individuals working in any capacity at the School are subject to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016*. The School has robust recruitment and vetting procedures to help prevent unsuitable people from working with children. Job advertisements and application packs make explicit reference to the School's commitment to safeguarding children, including compliance with disclosure and barring regulations and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

12.2 All staff members who have contact with children, young people and families will have appropriate pre-employment checks in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016*.

All members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are checked with the Disclosure and Barring Service and meet the requirements for compliance with Independent School Standards Regulations before starting work. Appointment checks for all staff working with boarders include:

- verifying a candidate's identity.
- obtaining a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity;
- obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- verifying the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
- verifying the person's right to work in the UK.
- if the person has lived or worked outside the UK, make any further checks the school considers appropriate;
- verifying professional qualifications, as appropriate.

12.3 The School will ensure that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service. In addition, a check is made of staff appointed to management positions to ensure that they are not subject to an s.128 direction.

12.4 All Governors, volunteer helpers, contractors working regularly during term-time, such as contract catering staff and adult members of the families of members of staff who live on site are also DBS checked.

12.5 At least one member on every short listing and interview panel has completed safer recruitment training.

12.6 The Headmistress and the Governors' Governance Committee are responsible for ensuring that our **single central record of pre-employment checks** is accurate and up to date.

12.7 We ensure that agencies and third parties supplying staff provide us with evidence that they have made the appropriate level of safeguarding checks on individuals who come to work in the School. All taxi drivers used by the School have been DBS checked.

12.8 The School will always report to the DBS anyone:

- who has harmed, or is likely to harm, or poses a risk of harm to a child; or
- if there is reason to believe that they have committed one of a number of listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009), and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left.

The School would also consider making a referral to the National College for Teaching and Leadership (NCTL) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The School would consult *Teacher Misconduct: the prohibition of teachers (July 2014)* and guidance on the NCTL website to ascertain what is the appropriate response in the individual situation.

### **13 STAFF INDUCTION, TRAINING AND DEVELOPMENT**

13.1 All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the School's Child Protection Policy, the Staff Code of Conduct, whistle-blowing procedures, the identity and function of the Child Protection Officer and other related policies. The induction will be proportionate to staff members' roles and responsibilities.

13.2 All staff are given and required to read at least Part 1 of the latest version of *Keeping Children Safe in Education* and updated training is given on the guidance to ensure understanding of its content and importance. This is given to all new staff at induction as a matter of course.

13.3 The Child Protection Officer will undergo updated training in child protection and inter-agency working every two years.

13.4 All staff members of the School and the governing body will undergo child protection training every three years. Where staff miss whole School training in child protection they will receive update training within School. This may include online training in general principles, with an additional School-specific session on procedures and the Child Protection Policy.

13.5 The nominated governor for child protection will undergo appropriate training prior to or soon after appointment to the role; this training will be updated every two years.

13.6 The School will ensure that staff members provided by other agencies and third parties, e.g. supply teachers, have received appropriate child protection training commensurate with their roles before starting work.

- 13.7 The Child Protection Officer will provide an annual briefing to the School on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.
- 13.8 Senior pupils (such as prefects) who are given responsibility over other pupils are briefed on appropriate action to take should they receive any allegations of abuse.
- 13.9 The School maintains accurate records of staff induction and training.

## **14 CONFIDENTIALITY AND INFORMATION SHARING**

- 14.1 We recognise that all matters relating to child protection are confidential.
- 14.2 The Headmistress or the Child Protection Officer will only disclose any information about a girl to other members of staff on a need-to-know basis.
- 14.3 All staff members must be aware that they cannot promise a child to keep confidential information which might compromise the child's safety or well-being.
- 14.4 All staff members have a professional responsibility to share information with other agencies in order to safeguard children.

## **15 INTER-AGENCY WORKING**

- 15.1 The School maintains effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care. The Child Protection Officer attends the termly meetings of the LSCB's Independent Schools Safeguarding Group.
- 15.2 The School would ensure that relevant staff members are able to participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children, or to participate in serious case reviews, other reviews and file audits as and when required to do so by the East Sussex Local Safeguarding Children Board; following up by implementing recommendations and completing required actions within agreed timescales.

## **16 SUPPORTING PUPILS**

- 16.1 We recognise that girls who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and experience some sense of blame.
- 16.2 The School will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning;
- ensuring a comprehensive curriculum response to e-safety, enabling girls and parents to learn about the risks of new technologies and social media and to use these responsibly;
- ensuring that child protection is included in the curriculum to help girls stay safe, recognise when they do not feel safe and identify who they can talk to;
- providing girls with a number of appropriate adults to approach if they are in difficulties;
- supporting the individual girl's development in ways that will foster security, confidence and independence;
- encouraging development of self-esteem and self-assertiveness while not condoning aggression or bullying;
- ensuring repeated hate incidents (e.g. racist, homophobic or gender- or disability-based bullying) are considered under child protection procedures;
- liaising and working together with other support services and those agencies involved in safeguarding children;
- monitoring girls who have been identified as having welfare or protection concerns and providing appropriate support.

## **17 CONTRACTORS, SERVICE AND ACTIVITY PROVIDERS AND WORK PLACEMENT PROVIDERS**

- 17.1 We will ensure that contractors and providers are aware of the School's Child Protection Policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.
- 17.2 We will seek assurance that employees and volunteers provided by these organisations, and working with our children, have been subjected to the appropriate level of safeguarding check in line with Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016. If assurance is not obtained, permission to work with the girls or use the School premises may be refused.
- 17.3 When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

## **18 SITE SECURITY**

- 18.1 All staff members have a responsibility to ensure buildings and grounds are secure and for reporting concerns that may come to light, and should report Health and Safety concerns to the Bursar or the Health and Safety Committee. All Staff wear School badges for the verification of identity.
- 18.2 Due to the nature of the site, and public rights of way through the grounds, it is impossible to secure the site entirely. In order to maintain the security of the School buildings all external doors are on keypad locks.

- 18.3 Visitors are expected to sign in and out in the visitors' book in reception and to display a visitor's badge while on the School site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.
- 18.4 The School will not accept the behaviour of any individual, parent or anyone else, that threatens School security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the School site.

## **19 QUALITY ASSURANCE**

- 19.1 Our policies are reviewed by Governors annually. The Child Protection Policy is scrutinised by the Governance Committee before being presented to the full board. The Chairman of Governors approves it for implementation.
- 19.2 Systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This includes periodic audits of child protection files and records by the Child Protection Officer. The Governor with responsibility for Child Protection makes an annual quality assurance visit to ensure that staff are aware of their safeguarding responsibilities, the School's procedures and the wider frameworks for Child Protection.
- 19.3 The Child Protection Officer, in liaison with the Nominated Governor with responsibility for Child Protection, completes an annual audit of the School's safeguarding arrangements.
- 19.4 The School's senior management and the Governing body will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements.

## **20 POLICY REVIEW**

- 20.1 This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle. The Policy will be amended whenever necessary, for example in line with new government and LSCB directives and guidelines.
- 20.2 The Child Protection Officer will ensure that staff members are made aware of any amendments to policies and procedures.

## **21 LINKED POLICIES AND PROCEDURES**

- 21.1 The following policies and procedures are relevant for the child protection and safeguarding policy and procedure.
- Access, Security and Visitors Policy
  - Anti-Bullying Policy
  - Attendance Policy

- Boarding Statement of Principles and Practice
- Children Missing from Education Policy and Procedures
- Complaints procedure
- Drug, Substances, Alcohol and Tobacco Policy
- Educational Visits Policy and risk assessments
- E-safety Policy
- Equalities Policy
- Health and Safety Policy and other linked policies and risk assessments
- Pupil Acceptable Use of ICT Policy
- Life Skills Policy (including Sex and Relationship Education Policy)
- Mental Health and Wellbeing Policy
- Missing Pupil Policy
- Rewards and Sanctions Policy
- Recruitment Policy and procedures
- Search and Confiscation Policy
- Social Media Policy
- Special Educational Needs – Statement of Provision
- Staff Code of Conduct
- Whistleblowing Policy

# THE ROLE OF THE DESIGNATED CHILD PROTECTION OFFICER

## **1 MANAGING REFERRALS**

- 1.1 Refer all cases of suspected abuse to East Sussex Children's Social Care and to the Police if a crime may have been committed.
- 1.2 Liaise with the Headmistress about safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- 1.3 Act as a source of support, advice and expertise to staff members on matters of child protection and safeguarding.
- 1.4 Liaise with agencies providing early help services and coordinate referrals from the School to targeted early help services for children in need of support.

## **2 RECORD KEEPING**

- 2.1 Keep written records of child protection and welfare concerns.
- 2.2 Ensure a stand-alone file is created as necessary for children with safeguarding concerns.
- 2.3 Maintain a chronology of significant incidents for each child with safeguarding concerns.
- 2.4 Ensure such records are kept confidentially and securely and separate from the child's educational record.
- 2.5 As soon as a child with safeguarding concerns moves to another School, liaise with the new School's Designated Child Protection Teacher for information sharing. Ensure the child's child protection or welfare concerns records are transferred to the new School as soon as possible.

## **3 INTER-AGENCY WORKING AND INFORMATION SHARING**

- 3.1 Cooperate with Children's Social Care for enquiries under section 47 of the Children Act 1989.
- 3.2 Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.
- 3.3 Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.

## 4 TRAINING

- 4.1 Undertake appropriate training, **updated every two years**, in order to:
- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness ;
  - understand the assessment process for providing early help and intervention, e.g. the East Sussex Safeguarding Children Continuum of Need guidance and tools and the early help planning processes;
  - have a working knowledge of how the local authority conducts initial and review child protection case conferences and contribute effectively to these;
  - be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers and young carers.
- 4.2 Ensure each member of staff has access to and understands the School's child protection policy and procedures, including providing induction on these matters to new staff members.
- 4.3 Organise whole-School child protection training for all staff members **every three years**. Ensure staff members who miss the training receive it by other means, e.g. by joining another School's training.
- 4.4 Attend meetings of the local Independent Schools Safeguarding Group.
- 4.5 Link with East Sussex Local Safeguarding Children Board to identify appropriate training opportunities for relevant staff members.
- 4.6 Ensure the School allocates time and resources every year for relevant staff members to attend training.
- 4.7 Encourage a culture of listening to the girls and taking account of their wishes and feelings in any action the School takes to protect them.
- 4.8 Maintain accurate records of staff induction and training.

## 5 AWARENESS RAISING

- 5.1 Review the Child Protection policy and procedures annually and liaise with the School's Governing body to update and implement them.
- 5.2 Make the Child Protection Policy and procedures available publicly help parents understand that referrals about suspected abuse may be made and to be aware of the role of the School in any investigations that ensue.
- 5.3 Provide an annual briefing to the School on any changes to child protection legislation and procedures and relevant learning from local and national serious case reviews.

## **6 QUALITY ASSURANCE**

- 6.1 Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum once a year).
- 6.2 Complete an audit of the School's safeguarding arrangements annually with the nominated Governor for Child Protection.
- 6.3 Provide regular reports, including an annual report, to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- 6.4 Take lead responsibility for remedying any deficiencies and weaknesses identified in Child Protection arrangements.

## ANNEX B

# TERMS OF REFERENCE FOR THE NOMINATED SAFEGUARDING GOVERNOR

- 1 The main role of the Nominated Safeguarding Governor on behalf of the Governing Body (which retains overall responsibility) is to act as the School's senior board level lead to take leadership responsibility for the School's safeguarding arrangements, which he/she will do by discharging the following functions:
  - 1.1 champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School;
  - 1.2 encourage other members of the Governing Body to develop their understanding of the Governing Body's responsibilities with regard to well-being, safeguarding and child protection and support them in the performance of these duties;
  - 1.3 ensure that the Governing Body puts in place a suitable child protection and safeguarding policy (CP Policy) and associated procedures which have proper regard to prevailing regulations, guidance, standards and advice;
  - 1.4 be familiar with the Local Safeguarding Children Board (LSCB) guidance and procedures relating to safeguarding and child protection and associated issues, including local protocols for assessment and the LSCB's threshold document, contributing to inter-agency working;
  - 1.5 contribute to ensuring any deficiencies in the School's safeguarding practices brought to Governors' attention from any source are investigated and addressed;
  - 1.6 meet regularly with the School's Child Protection Officer (CPO) in order to monitor the effectiveness of the School's CPS Policy and procedures and the implementation of these across the School. It is recommended that this is at least a termly meeting;
  - 1.7 ensure that the Governing Body receives a report on the implementation of the School's CPS Policy and procedures to support the full Governing Body's review of safeguarding in the School at least annually (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance [and guidelines adopted by the Governing Body]1;
  - 1.8 ensure that the Governing Body is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for the School's CP Policy or procedures;
  - 1.9 check that the CPO is part of the School's senior leadership team, and has sufficient time and resources at his/her disposal to carry out his/her duties effectively;

- 1.10 check that the CPO (and Deputy CPO, if appointed) receive appropriate training to provide them with the knowledge and skills required to carry out the role at least every two years, and that their knowledge and skills are appropriately refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role;
- 1.11 check that arrangements are in place for the inclusion of child protection training on the School's procedures in an induction programme for all people working in the School, no matter for how long, nor the status of that individual;
- 1.12 check that the School makes opportunities available to staff to feed into and shape the School's approach to safeguarding and safeguarding policies;
- 1.13 check safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers;
- 1.14 review the School's Single Central Register on an annual basis, and monitor the more regular checks made by the Chairman of the Governance committee, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies.
- 1.15 be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work;
- 1.16 check that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material;
- 1.17 ensure that staff have the necessary knowledge and understanding to keep looked after children safe, with identified staff tasked to promote the educational achievement of looked after children;
- 1.18 ensure that the Governing Body carries out regular risk assessments of factors particular to the School which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special educational needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyberbullying; and
- 1.19 both provide to, and seek from, the local authority and other relevant agencies information about how the Governing Body's duties in respect of safeguarding and child protection have been discharged, where appropriate or requested.

- 2 The identity of and contact details for the Nominated Safeguarding Governor, together with an outline of his/her duties, will be publicised widely within the School community to ensure that pupils, parents, staff and Governors understand the purpose and importance of the role.
- 3 To the extent that the role and duties of the Nominated Safeguarding Governor conflict with those assumed by others within the School, including the Chairman of Governors, the Governing Body will take all necessary action to resolve those conflicts so as to achieve clarity about respective roles and duties.
- 4 Each of the Nominated Safeguarding Governor and the Chairman of the Governing Body will undertake appropriate training in accordance with the LSCB's recommendations to fulfil the respective role and duties.

## PROCEDURE FOR MANAGING ALLEGATIONS OF ABUSE MADE AGAINST SCHOOL STAFF MEMBERS

1. The School takes seriously all allegations of abuse made against staff members, including volunteers, and will investigate them in line with the statutory guidance, *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September 2016*, and the [Pan-Sussex Child Protection and Safeguarding Procedures](#).
2. The process described below is a summary of the procedure described in the above documents. The member of School staff who is the liaison for the school should refer to them for details.
3. **The procedure applies to all adults working in the School or providing a service on behalf of the School to our pupils either within or outside School premises**, i.e. all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers (**collectively referred to as staff or staff members** in this procedure).
4. The allegations management procedure will be used in all cases where it is alleged that a staff member, has:
  - behaved in a way that has harmed a child, or may have harmed a child; or
  - possibly committed a criminal offence against or related to a child; or
  - behaved towards a child or children in a way that indicates that they would pose a risk of harm if they work regularly or closely with children.
5. Concerns include inappropriate relationships between adults and children. For example:
  - a sexual relationship between a child under 18 and an adult in a position of trust with them, even if the relationship may appear to be consensual;
  - grooming, i.e. meeting a child under 16 with intent to commit a relevant offence (section 15 of the Sexual Offences Act 2003); or
  - other behaviour that gives rise to concerns, such as possession of abusive images of children or inappropriate contact through texts or online, inappropriate messages, gifts or socialising with children.
6. If an allegation or concern arises about a staff member outside their work with children, and this may present a risk to children for whom the staff member is responsible, the general principles outlined in these procedures will still apply.
7. **Roles and responsibilities:**
  - Anyone who has concerns about, or has received an allegation about, the behaviour of a staff member needs to report the concerns immediately to the Headmistress. In the absence of the Headmistress, or if the Headmistress is the subject of the allegation, concerns must be reported to the Chairman of Governors. If both the Headmistress and the Chairman of Governors are absent, the allegation needs to be reported to the SPOA, who would then refer on to the Local Authority Designated Officer (LADO).

- The Headmistress will act as the School's liaison for investigations of allegations and liaise with the SPOA and the LADO.
  - The Chairman of Governors will act as the School's liaison, if the allegation is made against the Headmistress.
  - The LADO is involved in the overall management and oversight of individual cases. They will provide advice and guidance to the School, liaise with the police and other agencies and monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.
8. **Initial action by the person noticing concerns or receiving an allegation first:**
- Treat the matter seriously and keep an open mind.
  - Do not make assumptions or offer alternative explanations.
  - Do not investigate or ask leading questions, if seeking clarification.
  - Do not promise confidentiality, but give assurance that the information will only be shared on a need-to-know basis.
  - Act promptly.
  - Make a written record of the information. Where possible, record the exact words of the person making the allegation or the child's own words.
  - Record the time, date and place and names of people present when the allegation was made or concerning behaviour was observed. Record the time, date and place of alleged incidents, persons present and what was said, if these were mentioned by the person making the allegation.
  - Sign and date the written record.
  - Immediately report the matter to the Headmistress or the Chairman of Governors, as in 15.9 above and give them the written record.
9. **Initial response by the School:**
- Do not investigate the matter immediately or interview the staff member or the child concerned.
  - Obtain written details of the concern or allegation, signed and dated by the person reporting it. Countersign and date the written details and record the decisions made and the reasons for those decisions.
  - Contact the SPOA immediately to report the allegation and for a consultation. The allegation must be reported within one day at the most. The Headmistress may consult the LADO initially for advice but formal referrals should be made via the SPOA
  - If the allegation requires immediate attention but is received out of hours, contact the Children's Services Emergency Duty Team or the police and inform the LADO as soon as possible.
  - Refer allegations against a staff member who is no longer working in the School to the police in the first instance and then inform the LADO.
10. **Initial consideration of the allegation by the School, the SPOA and the LADO:**
- The School's liaison and the LADO will consider the nature, content and context of the allegation and agree a course of action, including whether further information is needed.
  - The School may need to obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations in the past and the staff member's current contact with children.
  - If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or likely to suffer significant harm, the SPOA will refer the case to Children's Social Care and ask them to convene a strategy discussion.

- The LADO will consult the police if a criminal offence may have been committed. If the threshold for significant harm is not reached but a police investigation may be needed, the LADO will immediately inform the police.
- If an investigation by Children’s Social Care or the police is not necessary, the School’s liaison and the LADO will discuss the options open to the School depending on the nature of the allegation and the evidence available. This will range from taking no further action to dismissal or a decision not to use the staff member’s services in the future.
- If the initial evaluation leads to no further action against the staff member concerned, the decision and justification should be recorded by both the School’s liaison and the LADO. Agreement should be reached on what information should be put in writing to the individual and what action should follow, including informing the person who made the allegation originally.

11. **Persons to be notified:**

- After consultation with the LADO, the School’s liaison should inform the accused person about the allegation as soon as possible.
- **However, if a strategy discussion is needed, or the police or Children’s Social Care need to be involved, the School should not inform the accused person until those agencies have been consulted and have agreed what information can be disclosed to the individual.**
- In principle, the School should inform the parents or carers of the children involved about the allegation. The SPOA and LADO should be consulted first to ensure that this will not impede any investigation or disciplinary process. In some cases, the parents or carers may need to be informed right away, e.g. if a child is injured and needs medical attention.
- The parents or carers and the child, if sufficiently mature, should be helped to understand the process and kept informed about the progress of the case and the outcome if no criminal prosecution will take place.

12. **Confidentiality:**

- Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated. Information should be restricted to only those who need to know in order to protect the children concerned, carry out the investigation and manage the disciplinary process.
- The Education Act 2011 introduced **reporting restrictions** preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same School.
- Reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about the investigation or decision from the disciplinary process. Reporting restrictions also cease if the accused person chooses to approach or respond to the press themselves, thereby waiving their right to anonymity.
- Breaching reporting restrictions is a criminal offence. Therefore, the School should inform the parents or carers concerned about the implications of publishing details of the allegation on social networking sites. They should be advised to seek legal advice, if they wish to apply to court for removal of reporting restrictions.
- The School’s liaison should discuss with the LADO how best to manage speculation, leaks and gossip within the School and the community at large, and press interest, if it arises. The School will have a prepared statement to give to the press should it be required in order to manage the response to the situation

**13. Supporting people:**

- The School together with Children's Social Care and the police, if they are involved, will consider the impact on the child concerned and provide support as appropriate.
- The Headmistress will ensure that the child and family are kept informed of the progress of the investigation, insofar as it is appropriate.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association or a colleague for support.
- The HR manager will ensure that the staff member is provided with appropriate support.
- The Headmistress will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.

**14. Managing risk during the investigation:**

- The perceived level of risk during the investigation needs to be considered and managed. In some situations the level of risk may require the staff member not to be working with specific children or all children in the School until the investigation is completed.
- There are several options open to the School, including:
  - redeployment so as not to come into direct contact with one or more children; or
  - refraining (agreeing that the person will not work with children during the investigation); or
  - suspension.
- Refraining and suspension should be considered as neutral acts but should not be automatic. Suspension should be considered only in cases where there is cause to believe children in the School are at risk of harm or the allegation is so serious that it might be grounds for dismissal.
- Decisions about risk are best made in a multi-agency forum such as the strategy discussion. The LADO will canvass the views of the agencies participating and inform the School. However, only the School has the power to refrain or suspend.
- Possible risks to the children concerned and any children in the accused staff member's home, work or community life will be evaluated and managed.

**15. Timescales:**

- Cases will be resolved as quickly as possible, consistent with a thorough and fair investigation.
- It is expected that the majority of cases should be resolved within one month and all but the most exceptional cases should be resolved within twelve months.
- However, the timing will depend on the nature, seriousness and complexity of the case and the right outcome is far more important than meeting timescales.
- Cases where it is immediately apparent that the allegation is unsubstantiated or malicious should be resolved within one week.
- The School should discuss the timing of actions with the LADO for all allegations that do not require police involvement but for which there are child protection concerns.
- If the nature of the allegation does not require formal disciplinary action, the School should start appropriate action within three working days.
- If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within fifteen working days.

**16. Resignations and compromise agreements:**

- The allegation will be investigated according to procedure, even if the accused staff member resigns or ceases to provide their services.

- Every effort will be made to reach a conclusion to the case should the staff member refuse to cooperate, having been given a full opportunity to answer the allegation and make representation.
- Although it would not be possible to apply disciplinary sanctions if the period of notice expires before the conclusion of the investigation, the outcome of the disciplinary process will be recorded.

The School will not use 'compromise/settlement agreements', for example where the staff member agrees to resign provided that disciplinary action is not taken and that a future reference is agreed.

**17. Outcomes of investigations of allegations:**

- **Substantiated** – there is sufficient evidence to prove the allegation
- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False** – there is sufficient evidence to disprove the allegation
- **Unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

**18. Disciplinary or suitability process and investigations:**

- The LADO and the School's liaison will discuss whether disciplinary action is appropriate in all cases where:
  - it is clear at the outset, or decided by a strategy discussion, that a police investigation or section 47 enquiry is not necessary; or
  - the police or the Crown Prosecution Service informs that the criminal investigation and subsequent trial are complete, or that an investigation is to be closed without charge, or prosecution is discontinued.
- The discussion will consider any potential misconduct or gross misconduct by the staff member, and take into account:
  - the information provided by the police and Children's Services;
  - the result of any investigation or trial; and
  - the different standards of proof in disciplinary and criminal proceedings.
- In the case of supply, contract or volunteer workers, the LADO and the School's liaison will work with the providing agency in deciding whether to continue using the person's services or whether they can provide future work with children or whether to report them for barring considerations.

**19. Record keeping:**

- The School will keep a clear and comprehensive summary of the case record and provide a copy to the accused staff member. A copy of the record should also be given to the LADO.
- The record will include details of how the allegation was investigated and resolved and the decisions reached. It will be completed in collaboration with the LADO.
- Details of allegations that are found to be malicious will be removed from personnel records.
- In the case of all other allegations, the summary will be placed in the staff member's personnel file and kept until the person reaches retirement age or for a period of 10 years from the date of the allegation, if that is longer.

**20. References:**

- If the allegation was proved to be malicious, false or unsubstantiated, it will not be included in any references for the staff member.

- A history of repeated concerns or allegations which have all been found to be malicious, false or unsubstantiated will also not be included in any references.

21. **Informing the Disclosure and Barring Service (DBS):**

- The LADO will discuss with the School's liaison whether the School will refer the staff member to the DBS and, in the case of a teacher to the National College for Teaching and Leadership (NCTL), if the allegation is substantiated and the person is dismissed or the School ceases to use the person's services, or the person resigns or ceases to provide their services.
- **It is a legal requirement for Schools to refer to the DBS anyone:**
  - **who has harmed, or is likely to harm, or poses a risk of harm to a child; or**
  - **if there is reason to believe that they have committed one of a number of listed offences (as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009), and have been removed from working in paid or unpaid regulated activity or would have been removed had they not left.**