

Red Gates School

Safeguarding Children Policy and Protocol

September 2020

For approval by:	Full Governing Body
Approved by the full Governing Body:	
Signed by Chair of Governors:	
Next Review Date:	September 2021



Red Gates School

Headteacher: Lorraine Slee

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[Safeguarding learning & development](#)

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Part A: Core operational policies and procedures

1 Purpose and Aims of policy

This policy sets out how the school will meet its statutory duty under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and help them to achieve good outcomes.

Aims

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with children including the completion of risk assessments;
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns;
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that links with relevant agencies are effective including working in partnership regarding child protection matters, including attendance at case conferences and core group meetings;
- Ensure the school environment is safe and is one in which pupils feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure pupils know there are adults in the school who they can approach if they are worried about anything;
- Ensure the curriculum and other provision, including opportunities in the Health and Wellbeing/PSHE curriculum, develop and equip pupils with the skills needed to feel safe
- Support for pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan;
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure staff follow accepted “safe practice” principles when working with pupils.
- Ensure pupils are protected from all forms of harm.

Covid-19

Keeping Children Safe in Education (KCSIE) remains in force throughout any response to coronavirus (COVID-19). The non-statutory, interim guidance on

safeguarding in schools has now been withdrawn as the government expected all settings across the nation to reopen for the new academic year commencing September 2020. Requirements for local interventions in educational settings will continue to be reviewed. Red Gates has a safeguarding addendum for Covid 19 which will be implemented as and when required.

2 Roles and responsibilities

2.1 Croydon's Children Families & Education Directorate

The Directorate includes services that will support the school to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an early help service
- providing statutory social work services under the Children Act 1989
- providing the school with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

2.2 Governing Board

The term 'governors' and 'governing board' is used throughout to refer to whoever is responsible for fulfilling governance functions. This could be the governors of a maintained school, the trustees of a single or multi-academy trust, or the local governing board to the function in question has been delegated within a multi-academy trust.

The Governing Board will ensure that the school meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- The school has the following policies in place and that these are regularly monitored, reviewed and updated where necessary
 - safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Partnership procedures and Croydon's internal policies

- a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
- a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and pupils are aware of the schools safeguarding and child protection policies and procedures.
- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The school has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the Governing Board has undertaken accredited safer recruitment training.

- There is a nominated member of the Governing Board who is responsible for Safeguarding and holds school accountable of their statutory duties.
- All staff receive safeguarding and child protection training annually and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation.
- The school has procedures in place to deal with allegations made against other pupils.
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

2.3 Role of the head teacher

The head teacher will ensure that the school meets its statutory safeguarding duty by ensuring the following:

- Staff members are inducted thoroughly and have read all the schools safeguarding and child protection policies, behaviour policies and the CSCP children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and know how to make or request appropriate referrals to children's social care.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Staff are encouraged to attend learning events and participate in audit activity provided by the Safeguarding Children Partnership as well as promote published learning from events and serious case reviews.
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The school offers a safe environment for staff and pupils to learn.

- Safeguarding issues are brought to the attention of the governing body.

2.4 Role of the designated safeguarding lead

The role of the designated safeguarding lead and their deputies is to take lead responsibility for safeguarding and child protection within the school and to be available during school hours for staff to discuss safeguarding concerns.

The designated safeguarding lead (and their deputies) will:

- liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
- keep the head teacher and the board of governors informed of on-going safeguarding and child protection issues and enquiries;
- provide advice and guidance for staff on safeguarding and child protection issues and making referrals;
- ensure the school's safeguarding and child protection policies are up to date and consistent with Croydon's Safeguarding Children Partnership policies and that policies are reviewed annually;
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1, the school's Code of Conduct, the School Safeguarding Policy including the Annex to this policy and the Behaviour Policy.
- Ensure that all staff who work directly with children must also read Annex A in KCSIE 2020.
- attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Croydon and the Safeguarding Children Partnership in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices;
- provide regular updates to all staff members and governors on any changes in safeguarding or child protection legislation;
- have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the Senior Management when considering any safeguarding action for a child with special needs;
- liaise with the designated teacher for LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child;

- oversee child protection systems (CPOMS – Child Protection Online Management System) within the school, including the management of records, standards of recording concerns and referral processes;
- provide a link between the school and other agencies, particularly children’s social care and the Croydon Safeguarding Children Partnership;
- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training annually;
- ensure parents are fully aware of the school policies and procedures and that they are kept informed and involved;
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support for the child on transfer.

2.5 Working with parents and carers

The school recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

The school will:

- make parents aware of the school statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by having a safeguarding statement on the home page of their website and making all school policies available on the school web-site or on request;
- provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff;
- consult with and involve parents and carers in the development of school policies to ensure their views are taken into account;
- ensure a robust complaints system is in place to deal with issues raised by parents and carers;
- provide advice and signpost parents and carers to other services and resources where pupils need extra support.

Schools should also be aware of the additional guidance available from the DfE on dealing with issues around parental responsibility: [Understanding and dealing with issues relating to parental responsibility](#)

2.6 Multi-agency working

The school will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and *Working together to safeguard children* 2018.

The school recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Partnership to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

2.7 Inspection

Since September 2019 since Ofsted's Inspection of schools, early years and Post-16, inspectors will judge whether establishments are effective in their provision of safeguarding. [Ofsted Education Inspection Framework](#). Additional guidance for Early Years is available [here](#).

3 Safeguarding children

3.1 Safeguarding: is about every child.

The school will carry out its duty to safeguard pupils which is:

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

(Working Together to Safeguard Children 2018)

The school will undertake this role so as to enable children to have optimum life chances so they can enter adulthood successfully.

3.2 Early help cases

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- children with disabilities and additional needs, including those with special educational needs
- young carers

- children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime;
 - children who frequently go missing from home, school or care;
 - children who are misusing drugs or alcohol;
 - children at risk of exploitation through modern slavery and trafficking;
 - children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
 - children who have returned home from care;
 - children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low-level neglect;
 - children at risk of radicalisation or exploitation
 - privately fostered children.
 - children who are at risk of honour based abuse such as Female Genital Mutilation or forced marriage
 - children who are persistently absent from education
 - privately fostered children
- Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the school.
 - If the child requires an early help service from another agency, the school will make a referral to the Single Point of Contact (SPOC) for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.
 - Where the child is receiving an Early Help service, the school will work as part of the Team Around the Child (TAC) and take up the role of lead professional where this is appropriate.
 - Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school believes that this is not the case, consideration should be given making a referral for a statutory social work service.

3.3 Child Protection: those at risk of significant harm

For a list of definitions and indicators of abuse and neglect, see part B, section 1.

Action may be needed to protect children and learners from specific safeguarding issues such as:

- Abuse: Neglect, physical, sexual and emotional
- Disguised compliance • Children missing in Education (CME)
- Children who are home schooled ('Hidden Children')
- Radicalisation / extremism
- So-called 'Honour Based' Violence (HBV)

- Breast Ironing
- Mental health concerns including self-harm
- Bullying including on-line (cyber) bullying and prejudice based bullying
- Racism, disability, homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Domestic Abuse
- Poor parenting
- Child sexual exploitation and trafficking (CSE)
- The impact of new technologies on sexual behaviour
- Substance misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence (including Child Criminal Exploitation: County Lines)
- Private fostering
- Sexting (Youth Produced Sexual Imagery)
- Peer on peer abuse • Teenage relationship abuse
- Serious Violent Crime
- Sexual violence
- Sexual harassment
- Children with family members in prison
- Children and the court system
- Homelessness
- Adverse Childhood Experiences (ACEs)
- Trauma and Attachment issues
- Up-skirting
- Knife Crime
- County Lines

The school will seek advice from the SPOC Professionals' Consultation Line to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

The SPOC Professionals' Consultation Number is 0208 726 6464

All referrals for a children's social care service will be made by way of Single Point of Contact (SPOC) Safeguarding Referral Form. SPOC is Croydon's "front door" for children's social care referrals and accepts referrals for all cases.

[SPOC Referral Form](#)

Parental consent for referral will be sought unless advised not to by a member of the SPOC team, specifically linking to allegations of sexual abuse, concerns of fabricated or induced

illness or the parent is the alleged perpetrator, but a referral will be made regardless of consent being given in cases where the child is at risk of significant harm.

Staff will also share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs.

The Online tool [Report a child to your local council](#) directs you to the local children's social care contact number.

3.4 Referral for a statutory social work service

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputy who are most likely to have the most complete safeguarding overview. Following consultation, the designated safeguarding lead should decide on whether to make a referral to children's social care via SPOC.

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Croydon's MASH team to gather relevant information from other agencies.

SPOC will inform the school of the outcome of any referral and what action children's social care will be taking. This may include any of the following:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting under child protection** procedures as set out in section 4 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.
- Providing interim services for the child and their family in the meantime whilst work is on-going (including details of appropriate services).

3.5 Children who need a Social Worker

Children at Red Gates may have a Children with Disability team social worker, if there is a support package in place from the Local Authority.

Children may also have a social worker due to neglect, abuse or difficult family circumstances. Their experience can leave them vulnerable to further harm and we have a duty as professionals to help protect them. The local authority should communicate with the designated lead so they know if a child has a social worker and therefore enable them to make decisions which are in the best interest of the child's safety, welfare and educational outcomes.

Further documents which may assist in supporting these families can be found in [Review of children in need. Help, Protection, Education](#) concludes the review.

4 Child protection procedures

4.1 Role of school

The school will work to the following policy documents in order to support the protection of pupils who are at risk of significant harm.

- Working together to safeguard children (*DfE 2018*)

[Working together to safeguard children](#)

- What to do if you're worried a child is being abused (*DfE2015*)

[What to do if you're worried a child is being abused - Publications - GOV.UK](#)

- The London Safeguarding Children Board child protection procedures

[London Safeguarding Children Board: Child Protection Procedures](#)

- Keeping children safe in education (*DFE 2020*)

- [Keeping Children Safe in Education](#)

- Croydon Safeguarding Partnership local policies and procedures

[CSCB local policies and procedures](#)

In line with these policies and procedures, the school will:

- identify those pupils where there are child protection concerns and make a referral to SPOC
- attend child protection case conferences in order to effectively share information about risk and harm
- contribute to the development and monitoring of child protection plans as a member of the core group
- carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing and liaising with the allocated social worker as required.

4.2 Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- Staff should refer to Part B for a full definition of significant harm and the specific indicators that may suggest a pupil may be at risk of suffering significant harm.

- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where required, advice can be obtained from the SPOC Professionals Consultation Line on a no-names basis.
- Concerns may be monitored over time and recorded on CPOMS. This is overseen by the Designated Safeguarding Lead and actioned as required.

4.3 Records

- Safeguarding monitoring records and child protection records relating to pupils are highly confidential and will be kept on CPOMS. All staff have secure logins with restricted access according to role.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- Records should show:
 - what the concerns were;
 - whether information of the concern was shared with the parent and what their response was
 - what action was taken to refer on concerns or manage risk within the school;
 - whether any follow-up action was taken;
 - how and why decisions were made.
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken and outcomes.
- A CPOMS record must be made;
 - whenever concerns arise or there is a serious incident **or**
 - where a child is being monitored, prior to a case conference or core group meeting.
- When a child who transitions to a new educational provision, the master file is passed to the designated safeguarding lead at the new school, transferred securely and confirmation of receipt obtained. Designated Leads should also consider if there is a need to share any key information about the family ahead of their start date. This may assist the new school in planning appropriate support for the family.
- A copy of child protection & safeguarding file should be retained by the school and kept in line with the school's information retention schedule. Child protection & safeguarding records must be disposed of as confidential waste.

4.4 Dealing with disclosures

If a pupil discloses to a member of staff that they are being abused, the member of staff should;

- listen to what is said without displaying shock or disbelief and accept what the child is saying;
- allow the child to talk freely;
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to children's social care;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- not ask direct questions but allow the child to tell their story;
- not criticise the alleged perpetrator;
- explain what will happen next and who has to be told;
- make a formal record on CPOMS and pass this on to the designated safeguarding lead.

DO NOT DELAY

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this – do not leave notes in the Designated Safeguarding Lead's pigeon hole as they may not get back to check their post until the end of the day once the pupil has gone home.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious;
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil;
- The Designated Safeguarding Lead may consult the SPOC.

MAKE WRITTEN NOTES

- At the earliest opportunity make a written record of your concerns, these can then be added to your school's formal reporting system - record facts accurately and do not express opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.
- Do not take photographs of any physical injuries, record on a body map. Do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using an online reporting system.

4.5 Referral

- Where possible, a decision on whether or not to refer a pupil to SPOC should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However this should not delay any referral and any member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior management team and take advice from the

SPOC team social worker. The designated safeguarding lead should be informed as soon as possible.

- Referrals should be in writing using a SPOC safeguarding referral form completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the SPOC safeguarding referral form within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with the SPOC Professionals’ Consultation Line to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- If the child already has an allocated social worker, the referral should be made directly to them. If the child is not already known to children’s social care, referrals should be made to SPOC. If the child lives outside Croydon, a referral should be made to their home local authority.
- All referrals will be acknowledged by the SPOC and the referrer informed of what action will be taken.
- If the school does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with children’s social care via the designated safeguarding lead.

4.6 Attendance at case conferences, core groups and child in need meetings

- The designated safeguarding lead will liaise with children’s social care to ensure that all relevant information held by the school is provided to children’s social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that the school is represented at child protection case conferences and core group meetings:
 - where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend
 - failing that, the designated safeguarding lead or their deputy will attend
 - if no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

4.7 Monitoring

Where a pupil is the subject of a child protection plan and the school has been asked to monitor their attendance and welfare as part of this plan;

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead;
- all information will be recorded on CPOMS prior to each conference and core group meeting and a report will be written for the conference
- copies of the monitoring records will be made available to all conferences and core group meetings.
- the designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

4.8 Confidentiality and information sharing

- All information obtained by school staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers.
- Where a child is at risk of suffering significant harm, schools have a legal duty to share this information with children's social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools must share any information about the child requested by children's social care.
- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents made aware of this. Before taking this step, schools should consider the proportionality of disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the SPOC Professionals Consultation Line on a "no names" basis to gain advice on whether this course of action should be taken.
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose.

- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school duty to share information.
- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the SPOC Professionals Consultation Line.

5 Early Years Settings within Schools

5.1 Legal and policy framework

As an early years provider delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.

[Statutory framework for the early years foundation stage](#)

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are child protection concerns.

5.2 Safeguarding and Child Protection

All safeguarding and child protection policies listed in sections 3 and 4 of this policy will apply equally to children in early years settings so far as they are relevant to that age group.

5.3 Mobile phones and photographs

- parents and carers are asked to switch off mobile phones if they are coming into school and leave the setting if they need to use their mobile;
- parents are generally prohibited from taking any photographs of children, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared;
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose;
- staff do not have mobile phones on them and use them only during breaks in the staff room.

- staff will adhere to the Acceptable Use of Internet and Related Technology Policy 2019 (E-Safety)
- photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. Where photographs and videos will involve LAC pupils, adopted pupils or pupils for whom there are security concerns, a member of the Senior Leadership Team will liaise with the Designated Safeguarding Lead to determine the steps involved. The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with a pupil;
- staff will report any concerns about another staff member's use of mobile phones to the Designated Safeguarding Lead; and
- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting will be contained in the policy on the use of mobile phones and cameras

5.4 Suitable People and Safer Recruitment

The school will follow the safer recruitment policy set out in section 6 of this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children and have the relevant qualifications.

Staff policies set out in section 6 of this policy will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive appropriate training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Croydon policy, '[The Management of Allegations against staff who work with Children and Young People](#)' as referred to in section 6 of this document.

Where early years staff are taking medication that may affect their ability to care for young children, this will be notified to the head teacher.

Childcare Disqualification – Appropriate checks should be made if there are concerns about a member of the team or the provision's management to make sure they are not disqualified from working in childcare. All information can be found in the [statutory guidance](#).

5.5 Staff training, skills and supervision

The school will ensure that:

- all staff in the early years setting have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy;
- all policies set out in section 7 of this policy will apply equally to early years staff
- all early years staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take;
- all staff are able to communicate effectively in English both orally and in writing;
- a member of staff who holds a current paediatric first aid certificate is available on the school premises at all times and accompanies children on school trips:
- a record is kept of staff training – type of training and dates.

5.6 Staff ratios

The school will ensure that:

- staff levels comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe;
- parents are kept informed of staff members and numbers;
- children are kept within staff sight and hearing at all times.

5.7 Health

The school will:

- promote the health of children attending the Early Years provision
- take necessary steps to stop the spread of infection
- administer medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner
- notify Ofsted of any serious accident, illness or death of any child within 14 days.

5.8 Health and safety and suitability of premises

The school will ensure that all indoor and outdoor spaces and facilities used for Early Years settings are safe and fit for purpose and comply with school policies and standards for site

safety and health and safety as set out in section 8 of this policy. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details, and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent. Procedures for uncollected children is addressed in the Attendance Policy.

5.9 Managing behaviour

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and cognitive ability and that corporal punishment is not used or threatened.

[Behaviour and discipline in schools](#)

All staff are trained to at least an introductory level in PROACT-SCIPr-UK to support behaviour across the school.

PROACT-SCIPr-UK emphasises proactive and preventative strategies which integrates entirely with the individualised person-centred planning and visual communication advocated by Red Gates. Staff are expected to tailor the environment, language and communication, and learning resources in an attempt to prevent challenging behaviour or a pupil reaching a behavioural crisis.

6 Safer recruitment

6.1 General principles

The school recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working in the school are suitable do to so and do not pose any kind of risk to children.

The school will follow the *Keeping children safe in education* guidance (DfE 2020).

- The school will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors in accordance with statutory requirements.
- No staff member, volunteer, governor or anyone involved in the management of a school will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed, including section 128 checks relating to the recruitment of governors.

- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school (see section 6.4).
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.
- Staff and governors who normally sit on interview panels will be trained in safer recruitment and no interview should go ahead unless at least one member of the panel has undertaken safer recruitment training. Schools will take up the accredited safer recruitment training offered through the Croydon Safeguarding Children Partnership or any other accredited training provider.
- Although the head teacher will have day-to-day responsibility for the recruitment of staff, the Governing Board will ensure that they maintain an overview of recruitment systems in order to scrutinise practice and ensure all statutory checks are carried out.
- Staff in school responsible for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- In schools, the head teacher will be responsible for keeping a single central record of all staff and volunteers (including governors) who work at the school.
- The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained.
- Where the school has salaried trainee teachers, the school will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.
- Where staff are recruited via third parties such as employment agencies, the head teacher will:
 - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
 - request written confirmation of the outcome of all checks
 - request written confirmation that an enhanced DBS certificate has been received by the agency
 - check the identity of agency staff when they first present for work to ensure they are the person against whom the checks were taken out.

6.2 Checks to be taken out

Further descriptions about the types of checks can be found on p36 KCSIE 2020. Also available of the [DBS website](#). The DBS maintains 'barred lists' of those unsuitable to work with children and vulnerable adults.

In the recruitment and selection of staff and volunteers schools/colleges will at all times adhere to the government guidance contained within "*Working Together to Safeguard Children*" (July 2018) and '*Keeping Children Safe in Education* (DfE 2020).

The school will verify the following information for all new staff and record on the single central register:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided.
- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked in the presence of the applicant.
- Since 1st September 2018, schools no longer have to ask staff questions about cautions or convictions of someone living or working in their household.
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018, Part 2 Childcare (Disqualification) Regulations 2018, section 9, states that such a disqualification applies only to 'work in domestic premises'.
- A change in law means that Disqualification by Association will only apply on domestic premises. However, Disqualification under the Childcare Act 2006, still applies to staff themselves.
- Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including information from the barred list. If the applicant will begin work before an enhanced DBS check can be completed, a barred list check will be obtained.
- What is not known from a DBS check is whether a person has a child placed under a care order, whether they have had a childcare registration cancelled or refused for any reason other than non-payment of fees or whether there have been any relevant overseas convictions. All staff should complete a self-declaration stating that they are not disqualified under the Childcare Act 2006 as amended in 2018. By reading and signing this policy they are making this self-declaration.

- In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on Teacher Regulation Agency (TRA) Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.
- If a school or college wishes to employ a person before the DBS check has been returned, they must make sure that person is appropriately supervised and that all other checks, including a Barred check have been completed.
- Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.
- Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role.
- The school will keep copies of the following documents on staff personnel files:
 - documents used as proof of identity such as passports or driving licences, until such time as the approval process is completed;
 - a summary of the DBS certificate may be kept (from September 2018 a copy of the DBS certificate may be kept on file).
 - documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).

If a school or college knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form or regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of: attempting to engage or engaging in such work. (KCSIE 2020, p.37)

Details on the 'Prohibitions of Teachers' provides information on what the order prevents if there is a full or interim prohibition order. A section 128 direction restricts the individual taking part in management of independent schools (including academies and free schools).

Further details on checks can be found on page 37 KCSIE 2020.

6.3 References

- Applicants will be asked to provide a full employment history and details of at least two referees, including previous and recent employers, who should be a senior member of staff with the authority to provide references. References from colleagues will not be acceptable.
- All references will be taken up prior to interview and will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided.

- References will be taken up from current employers only; if the applicant is not currently employed, verification will be sought from their previous school as to the dates the applicant was employed and the reasons for leaving the post.
- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.
- Schools should follow up gaps in previous employment.

6.4 DBS checks

In order to ensure that people who work in the school are suitable to do so and are not barred from working with children, the school will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle
- personal or intimate care.

The activity must be carried out regularly as part of the staff member's day to day responsibilities and the checks will be reasonable in order to safeguard children.

Full DBS checks with barred list checks will also be carried out on permanent staff members working at the school or unpaid volunteers who regularly work unsupervised at the school and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but **not** barred list checks.

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by whoever is responsible for recruitment in the school, for example the head teacher or governor, and the following will be taken into consideration when deciding on this.

- the age of the children;
- their level of vulnerability;
- the numbers of children in the group;
- the nature of the role;
- opportunities for contact with the children.

The school has robust procedures for day to day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

The school will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

6.5 Volunteers and Supply Staff

Schools must obtain written confirmation from the agency or third-party organisation that they have carried out the relevant checks (enhanced DBS). Where there is need for a Barred-List check, schools must make sure the check had been completed by the agency and check the details relate to the person presenting themselves for work.

The head teacher will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany pupils on school outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that is appropriate and proportional to the duties assigned to them.
- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children should be subject to an enhanced DBS check, including barred list information.
- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but this may not include a barred list check.
- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the head teacher will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:
 - The nature of the role
 - What information is already known about the volunteer
 - What references from work or volunteering activity the volunteer has provided regarding suitability
 - Whether the role is eligible for an enhanced DBS check.

- The school will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.
- Volunteers carrying out a regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers will be fully inducted in relation to all school policies and procedures.

6.6 Trainee/Student Teachers

Applicants for initial teacher training who are employed by the school/college, the school/college must make the necessary checks. If the student is fee funded, it is the responsibility of the training provider to carry out necessary checks. Written confirmation of checks should be obtained by school/college.

Schools and colleges have a legal duty to refer anyone to the DBS who has harmed, poses a risk of harm to a child or vulnerable adult. (Full details can be found on P48 KCSIE 2020)

6.7 Alternate Provision

The school remains responsible for the safeguarding of children of any pupils they place in Alternative Provision.

Whenever the school places a pupil with an Alternative Provider, the school will obtain written confirmation of the provider's safeguarding and child protection policies and that all relevant vetting and barring checks on individuals working at the establishment have been carried out.

All pupils placed in Alternative Provision should be visited regularly.

[Alternative Provision guidance](#)

7 Staff practice and conduct

7.1 Induction and training

- The head teacher will ensure that all staff are fully inducted, are made aware of the following policies of the school and that staff are fully aware of their role in implementing these:
 - Safeguarding and child protection policy and procedures
 - Behaviour policy
 - Staff code of conduct
 - Children missing from education policy.

- Staff will be asked to confirm in writing that they have received and read all relevant staff policies, including “*What to do if you are worried a child is being abused*” guidance and KCSIE 2020 part 1 and Annex A.
- The designated safeguarding lead will ensure that all staff are fully inducted with regard to the school child protection procedures and that they receive safeguarding and child protection training annually.
- The head teacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- School staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses.
- Schools staff will also receive training on Early Help and the SPOC safeguarding referral process as part of their safeguarding training.
- School staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation.

7.2 Conduct and safe teaching practice

- The school expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- The head teacher will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the school expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- Governors will have their own separate code of conduct. This is a responsibility of the governing board.
- Staff will be expected to follow the school social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with pupils and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the school computer system.

7.3 Providing intimate or personal care to pupils

Staff at Red Gates support children with their intimate care routines. During these routines the following is observed;

- Staff follow the schools intimate care policy.
- When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated safeguarding lead.
- Staff should ensure to the best of their ability that changing areas are private and that others are not able to enter while the child is being changed.

7.4 Behaviour management, and use of reasonable force

The school has a behaviour management policy, which has been agreed by the Governing Board and follows government guidance; any use of physical intervention and restraint will be linked to the implementation of this policy and in line with the PROACT-SCIPr-UK framework .

7.5 Allegations against staff

In the event that an allegation is made against a member of staff or volunteer, the school will follow Croydon's procedures for managing allegations against a member of staff.

[The Management of Allegations against Staff who work with Children and Young People](#)

The Governing Board will appoint the head teacher as the school representative for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the head teacher; allegations against the head teacher will be referred to the Chair of the Governing Board.

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a child
- Possibly committed a criminal offence against/related to a child
- Behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children

This applies to any child the member of staff/volunteer has contact within their personal, professional or community life. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should

not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the head teacher/principal. If the concerns are about the head teacher/principal, the Chair of the Governing Board should be contacted.

The head teacher/principal will always consult the Local Authority Designated Officer (LADO).

Following consultation, the head teacher/principal in agreement with the LADO will decide on appropriate action:

- immediate referral to the SPOC team
- consideration of disciplinary proceedings
- consideration of a senior strategy meeting

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupils/students may also be at risk. The procedures in "Safeguarding Children and Safer Recruitment in Education" (DfE, 2006 – Updated 2011), Working Together to Safeguard Children (July 2018) and Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools" (DfE 2011) will be followed in such cases;

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2020 (page 57-68) will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

7.6 Whistleblowing

The school fosters a culture of openness in line with the "Freedom to speak up" review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the school that may cause a risk to children.

The school recognises that there may be circumstances where staff and pupils feel unable to raise concerns or incidents of malpractice within the school environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools are failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the school, staff and volunteers may report concerns to the following;

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil;
- The following numbers can be used where there are issues regarding the school overall procedures around safeguarding
 - Croydon Council's confidential whistle blowing email address – schoolwhistle@croydon.gov.uk
 - the Ofsted whistle-blowing line on **0300 123 3155**
 - the NSPCC whistleblowing advice line on **0800 028 0285** (open 8am to 8pm) or email help@nspcc.org.uk .

The head teacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

- The CSBP has an [escalation policy](#) which can be used by staff in school settings

8 Health and safety and risk assessments

8.1 Responsibility for health and safety

The Governing Board and head teacher will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within the school environment.

Any health and safety policy adapted by the school will be based on the government guidance (link below) and will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves.

[Health and safety: Advice on legal duties and powers](#)

Day-to-day responsibility for health and safety issues in the school will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training. There should also be a named governor responsible for health and safety. These are:

Name: Eileen Lawlor

Designation: School Business Manager

Contact details: eileenlawlor@redgates.croydon.sch.uk

Name: James Stremes

Designation: Governor with responsibility for health & safety

Contact details: jamesstremes@redgates.croydon.sch.uk

8.2 Risk assessments

The school will seek to identify and manage risk through the use of risk assessments. These will be carried out:

- on an annual basis for the school environment as a whole;
- for all school trips;
- for pupils travelling between locations during the school day;
- whenever there are any changes to the school environment or school practices;
- following any serious incident.

Consideration should also be given to conducting risk assessments before PTA and other parent led events (e.g. fireworks or fairs) where people outside the school may have unregulated access or the usual measures for health and safety may not be sufficient.

8.3 Working with aggressive and violent parents

Where schools are working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

8.4 Site security and visitors

- The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The head teacher will decide whether or not contractors should be subject to DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher will request written confirmation that relevant checks have been carried out for that individual.
- All visitors and contractors will be:
 - informed to report to reception on arrival;
 - expected to provide proof of identity
 - expected to wear a name-badge or carry some form of identification at all times when on the school premises;
 - suitably supervised by school staff at all times;
 - made aware of school health and safety procedures.

- The head teacher will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

8.5 Monitoring and review

To enable the school to monitor the safety of the premises and the school environment, as well as the implementation of policies, the head teacher and the governing board will ensure that;

- all school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and agreed by the governing board;
- the school keeps a central record of all accidents and incidents including what action was taken and by whom;
- staff are aware of their responsibility to record accidents and incidents;
- the head teacher has an overview all accidents/incidents;
- serious accidents and incidents are reported to the Governing Board ;
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children;
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

Part B: Additional safeguarding policies and procedures including vulnerable groups

All children at Red Gates School may be more vulnerable to harm and abuse. They may also have difficulty in reporting harm and abuse due to communication difficulties and professionals may miss vital indicators.

School policies reflect these issues and recognise that staff need to be vigilant to signs of abuse and be able to help the children to overcome barriers to seeking the necessary help.

Definitions of abuse

1 DEFINITIONS OF ABUSE

The following definitions of abuse are set out in statutory government guidance and provide the framework for responding to risk to children.

Abuse and neglect are forms of maltreatment. A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children and young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger.

Physical abuse

- 1.1 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 fabricates the symptoms of, or deliberately induces, illness in a child - see definition of Fabricated or Induced Illness.

Emotional abuse

- 1.2 Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent effects on the child's emotional development and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children
- Exploiting and corrupting children.

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

Sexual abuse

- 1.3 Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Sexual abuse includes abuse of children through sexual exploitation.

Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a child is under the age of 13 it is classified as rape under **Section 5 Sexual Offences Act 2003**.

Sexual abuse includes non-contact activities, such as involving children in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Neglect

- 1.4 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 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.

1.5 Possible indicators of abuse and neglect

Neglect	<ul style="list-style-type: none"> • Inadequate or inappropriate clothing • Appears underweight and unwell and seems constantly hungry • Failure to thrive physically and appears tired and listless • Dirty or unhygienic appearance • Frequent unexplained absences from school • Lack of parental supervision
Physical abuse	<ul style="list-style-type: none"> • Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury • Injuries in unexpected places or that are not typical of normal childhood

	<ul style="list-style-type: none"> injuries or accidents • High frequency of injuries • Parents seem unconcerned or fail to seek adequate medical treatment
Sexual abuse	<ul style="list-style-type: none"> • Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development • Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend • Continual, inappropriate or excessive masturbation • Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy • Unwillingness to undress for sports
Emotional abuse	<ul style="list-style-type: none"> • Developmental delay • Attachment difficulties with parents and others • Withdrawal and low self-esteem
Indirect indicators of abuse and neglect	<ul style="list-style-type: none"> • Sudden changes in behaviour • Withdrawal and low self-esteem • Eating disorders • Aggressive behaviour towards others • Sudden unexplained absences from school • Drug/alcohol misuse • Running away/going missing
Parental attributes	<ul style="list-style-type: none"> • Misusing drugs and/or alcohol • Physical/mental health or learning difficulties • Domestic violence • Avoiding contact with school and other professionals

Guidance and policies relating to a range of topics can be found on the [CSCB website](#).

2 Non-collection of children from school

The school will put in place a policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents of children who do not use school transport, will be asked to provide the details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected or the parent/carers is uncontactable should the child need to be collected due to illness.

Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual.

In the event that anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave but contact the parent immediately.

If a child is uncollected at the end of the school day, the school will follow the procedure agreed with children's social care:

- The schools will try to make contact with the parent or other family members, and wait with the child until someone comes to collect them.

- Children will not be released into the care of another parent even where they offer to take the child home.
- The school will contact the SPOC Professionals' Consultation Line to seek advice at 4.00pm if there are difficulties in contacting parents or other family members.
- If all possible means of contact have been exhausted and no contact can be made with the parent by 4.30pm, the school will contact SPOC and if advised to do so the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social services office.
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so.
- Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead. If there are also child protection concerns, a referral should be made to children's social care via SPOC.

Additional policies

Attendance Policy

3 Children who are missing from education (CME) or home educated

The Designated Safeguarding Lead needs to be made aware of those children who are persistently absent or missing from school as this may be an indicator of welfare concerns.

Red Gates Attendance policy states clearly who needs to be notified and what action should be taken and any relevant timescales. Parents should be asked to provide contact details for at least 2 or more people who can be contacted in the event that a child does not attend school. School will refer to Croydon's "Children missing from education" policy

[Children Missing from Education and Pupil Off Rolling](#)

Where a parent notifies the school that they are removing the child so they can be educated at home, the following notifications should be made:

- The Learning Access team must be notified of all decisions.
- If the child is already known to children's social care, their allocated social worker should be notified immediately.
- If the child is not known to children's social care, but the school has concerns about their welfare, the designated safeguarding lead should make a referral to children's social care via SPOC.

4 Peer on peer abuse

Peer on peer abuse is where a pupil's behaviour is likely to cause significant harm to other pupils.

This is most likely to include, but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- gender-based violence;
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals;
- upskirting (typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019)

This type of abuse should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The school/college will refer the perpetrator and the victim to children's social care via SPOC

5 Harmful sexual behaviour, sexual violence and harassment

Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable. It is important to note that Children with Special Educational Needs and Disabilities can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers.

Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same.

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

The designated safeguarding lead (or deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual

violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

The school/college will ensure there is a robust response to any incidents and will follow the procedures set out in Part 5 of the Keeping children safe in education statutory guidance

Cases will be managed internally by the school without referral to other agencies where the incident involves low level concerns or is a one –off occurrence where there is no further risk to the victim or other pupils.

Further advice can be found in:

Sexual violence and sexual harassment between children in schools and colleges

What to do if you are informed that a parent is on the sex offenders register

In this situation the head teacher/principal will be guided by parole conditions where relevant to keep children safe in school. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

6 Online safety

As part of their duty to provide a safe learning environment and at an appropriate level for the child's cognitive ability, school should ensure their pupils know how to remain safe online.

There is considerable risk to children online but they can be categorised within these three areas as stated within KCSIE:

content:

- being exposed to illegal, inappropriate or harmful content; for example: pornography, fake news, racist, misogynistic, self-harm, suicide, anti-Semitic, radical and extremist;

contact:

- being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults for the purposes of grooming children; and

conduct:

- personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, sharing others explicit images and online bullying.

The DfE published [Teaching Online Safety in Schools](#) identifying the importance of including reporting and acting on online safety concerns within the Child Protection Policy, school behaviour policy and bullying policy.

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system.

Pupils should be just as clear about what is expected of them online as offline. A recommended framework published by UK Council for Child Internet Safety (UKCCIS) supports the delivery of online safety. [Educated for a Connected World](#).

Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are;

[Be internet legends](#)

[Disrespect Nobody](#)

[PSHE Association](#)

[ThinkUKnow](#)

[Safer Internet centre](#)

[360 Safe Website](#) has a free online self-assessment tool for schools.

7 Domestic abuse and/or sexual violence

Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. Schools can refer young people affected by domestic or sexual violence to SPOC.

Further advice and guidance can be obtained from the Family Justice Centre who can be contacted by phoning their helpline of 0208 688 0100 or by emailing fjc@croydon.gov.uk

Specific guidance on adolescent to parent violence and abuse is published by the Home Office [Adolescent to parent violence and abuse \(APVA\)](#)

8 Prevention of radicalisation and extremism

The school's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

[Promoting fundamental British values as part of SMSC in schools](#)

Under Counter-Terrorism and Security Act 2015, the school/college also has a duty to refer young people on to Croydon's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

[The Prevent Duty](#)

Where a school/college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation,

the school/college should make a referral to SPOC using the SPOC Safeguarding Referral Form.

8.7 Educate Against Hate, a website launched by Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British Values) to help recognise and address extremism and radicalisation in young people.

8.8 Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

9 Mandatory reporting of Female Genital Mutilation (FGM)

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK, but is a surprisingly common form of abuse. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of five and eight. It is extremely harmful and has short and long term effects on physical and psychological health.

9.1 Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

9.2 Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

9.3 Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The school will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM:

[Multi-agency statutory guidance on female genital mutilation](#)

Where FGM is visually identified or verbally disclosed, school will follow the mandatory reporting rules and make appropriate referrals to the police and SPOC using the SPOC Safeguarding Referral Form.

9.4 So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including **Female Genital Mutilation FGM** (mentioned above), forced marriage, and practices such as breast ironing.

9.5 Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

9.6 Children at Risk of Forced Marriages

No faith supports the idea of forcing someone to marry without their consent. This should not be confused with arranged marriages between consenting adults. Forced marriage is an example of honour based abuse.

“Forced Marriage is an abuse of human rights” Universal Declaration of Human Rights Article 16 (2)

If a school becomes aware of a child that may be at risk of a **forced marriage** they should in the first instance to SPOC. If a child is at immediate risk they should contact the police. Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office’s Forced Marriage Unit by phone 0207 008 0151 or emailing fm@fco.gov.uk
[Forced marriage - FCO Guidance](#)

9.7 Honour Based Violence

Honour based violence is an ancient cultural tradition that encourages violence towards family members who are considered to have dishonoured their family. It is rooted in domestic violence and is often a conspiracy of family members and associates meaning victims are at risk from their parents and families.

For this reason, staff should **not** approach the family or family friends, or attempt to mediate between the child and family, as this will alert them to agency involvement.

National Contact Numbers: Forced Marriage Unit – 0207 608 0151 Honour Network – 0800 5999 247

National Domestic Helpline – 0808 2000 247

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

10 Looked after and previously looked after children

The school recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The school/college's designated teacher for LAC and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, the designated safeguarding lead will consult with the designated teacher to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

Schools has a duty to promote the education of previously looked after children; these are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked after children.

The Virtual School Head is the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of a local authority's looked-after children, including those placed out-of-authority. More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked After Children](#).

11 Children with special education needs and disabilities (SEND)

The school/college is aware that children with special education needs may be more vulnerable to harm and abuse and may be more likely to experience bullying.

They can face additional safeguarding challenges because;

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs;
- difficulties may arise in overcoming communication barriers;
- there may be a higher risk of social isolation

12 Privately fostered children

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent but is a 'close relative' for 28 days or more. Schools have a legal duty to notify Croydon of any pupils they know to be private fostered. Designated safeguarding leads should refer to SPOC any private fostering arrangements that come to their notice.

Private Fostering is used as a form of childcare by parents who are not able to take care of their child on a day to day basis, for whatever reason. However, unreported Private Fostering Arrangements can be used in order to exploit children.

12.1 Why are children in Private Foster Care?

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents have moved away, but the child stays behind (e.g. to stay at the same school to finish exams)
- teenagers living separately from their own family
- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families

12.2 Are children in private foster care defined as ‘Local after Children’?

No. The term ‘Looked after Children’ means children who are looked after by the local authority. Privately fostered children are outside the care of the local authority. Schools should not therefore code children in private foster care as ‘LAC’.

13 Young carers

If schools have concerns about a child (which could be the sibling of a pupil) they believe to be a young carer, they can contact the Young Carers Service on 0208 649 9339. Further details can be found on their website – www.talkofftherecord.org

14 Fabricated or Induced Illness

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child’s biological mother, exaggerates or deliberately causes symptoms of illness in the child.

15 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being evicted from a property. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

16 Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

17 Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed and there are two age appropriate guides to support children.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

18 Contextual safeguarding for young people

The school/college is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at school/college or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. School safeguarding policies must therefore reflect the needs of young people in their own communities

Schools/colleges act as a protective factor in children's lives. Children who do not attend can become *hidden*, which means that schools/colleges are less able to help and protect them. Children who do not attend school may be at further risk of not achieving their educational potential. This could include the following groups;

- Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.
- Children who fall under the heading 'educated at home', but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
- Children attending unregistered schools, sometimes under the guise of being electively home educated.
- Children in alternative provision that is of insufficient quality or is not provided for the required hours.
- Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

18.1 Children who run away/go missing

The London Child Protection Procedures define a child as 'missing' if their whereabouts are unknown, whatever the circumstances of their disappearance.

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If a school becomes aware of a child who is missing from home or care and that child has not been reported missing to the police they should so using 101.

Running away may be an indicator of other problems and therefore referral to SPOC should be considered. Early intervention after the first episode may prevent a child being exploited.

[Children who run away or go missing from home or care](#)

18.2 Child trafficking and Modern Slavery

Child trafficking is the recruitment and movement of children for the purpose of exploitation; it is a form of child abuse. Children may be trafficked within the Country, or from abroad. It may be linked with Sexual Exploitation and Private Fostering. Children may be trafficked for:

- Sexual exploitation
- Labour exploitation
- Domestic servitude
- Cannabis cultivation
- Criminal activity
- Benefit fraud
- Forced marriage
- Moving drugs.

If you become aware of child or young person who may be at risk a referral should be made to SPOC

[Safeguarding children who may have been trafficked](#)

18.3 Child criminal exploitation – county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement –based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females and young people or adults;
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

If you become aware of child or young person who may be at risk a referral should be made to SPOC.

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

19 Children at risk of Sexual Exploitation (CSE) or Criminal Exploitation (CCE)

Both Child Criminal Exploitation and Child sexual exploitation is a form of abuse that occurs when 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 in sexual or criminal activity a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with male or female, adults or children and can be a one-off event or a series (see point 19 for further indicators of CCE).

19.1 The three main types of child sexual exploitation:

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.

Inappropriate relationships

- Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

Boyfriend/Girlfriend

- Abuser grooms a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

Organised exploitation and trafficking

- Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

19.2 Potential vulnerabilities

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories);
- Sexual identity.

If a school becomes aware of child that may be being sexual exploited they should refer to SPOC.

[Child sexual exploitation – DfE guidance](#)

20 Serious Violent Crime - people at risk from gang activity or serious youth violence

Schools are a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities.

Staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These may indicate involvement or approach by criminal networks or gangs.

Schools need to be alert to the possibility of children and young people bringing weapons onto their site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person.

Under Croydon's weapons in schools protocol the police must be informed via 101 of any pupil found in possession or a weapon in school or any weapon that is found on the school site.

[Preventing youth violence and gang involvement](#)

21 Children requiring mental health support

Schools play a key role in supporting the emotional health and well-being of pupils. In some cases, mental health can be an indicator of abuse and all provisions should have clear procedures on how to access the appropriate support for these children.

More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Children who have experienced abuse and Adverse Childhood Experience (ACEs) through traumatic events are likely to be impacted. Only appropriately trained professionals should make diagnosis. The Additional documents listed below may also assist in supporting children and young people.

22 Opportunities to teach safeguarding

The Governing body should ensure the school provide opportunities for children to learn about Safeguarding. General issues may be addressed through the broad and balance curriculum already in the school but key issues relevant to the school community and sensitive issues may be taught through Relationships Education (all Primary pupils) and Relationships and Sex Education (all secondary pupils) and health Education (for all pupils in state funded schools) which is compulsory from September 2020.

Schools are able to be flexible on how they teach this. DfE documents can be found [here](#).

23 The Child's Wishes

The best interest of the child should always be at the heart of any decision making process around safeguarding. The Governing Body or school leaders should always do their best to ensure the child's wishes and feelings are taken into account when decisions for support are made and actions taken.

24 Other relevant safeguarding policies

Additional guidance, policies and procedures can be accessed at:

[CSCB local policies and procedures](#)

[CSCB Safeguarding in Education Toolkit](#)

[DfE Alternative Provision guidance](#)

[DfE School Attendance guidance](#)

[DfE School Attendance Parental Responsibility Measures guidance](#)

[DfE Behaviour and Discipline in Schools guidance](#)

[DfE Preventing and Tackling Bullying guidance](#)

[DfE Children Missing Education guidance](#)

[DfE Best Practice Advice for School Complaints Procedures](#)

[DfE and ACPO Drug Advice for School guidance](#)

[DfE Advice for Schools on Equality Act 2010](#)

[DfE Exclusion from maintained schools, academies and PRUs in England](#)

[DfE Supporting pupils at school with medical conditions](#)

[DfE Guidance on First Aid for Schools](#)

[DfE Mental health and behaviour in schools](#)

[DfE Use of reasonable force guidance](#)

[DfE Promoting fundamental British values as part of SMSC in Schools](#)

[DfE The Prevent Duty – Advice for Schools](#)

[DfE Sexual violence and sexual harassment between children in schools and colleges](#)

[DfE Children who run away or go missing from home or care](#)

[Child sexual exploitation – DfE guidance](#)

[Preventing youth violence and gang involvement](#)

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

[Preventing and tackling Bullying](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children,](#)

[Young People, parents and carers](#)

[Domestic Abuse: Various information/Guidance](#)

[Faith Based Abuse](#)

[Relationship Abuse: disrespect nobody](#)

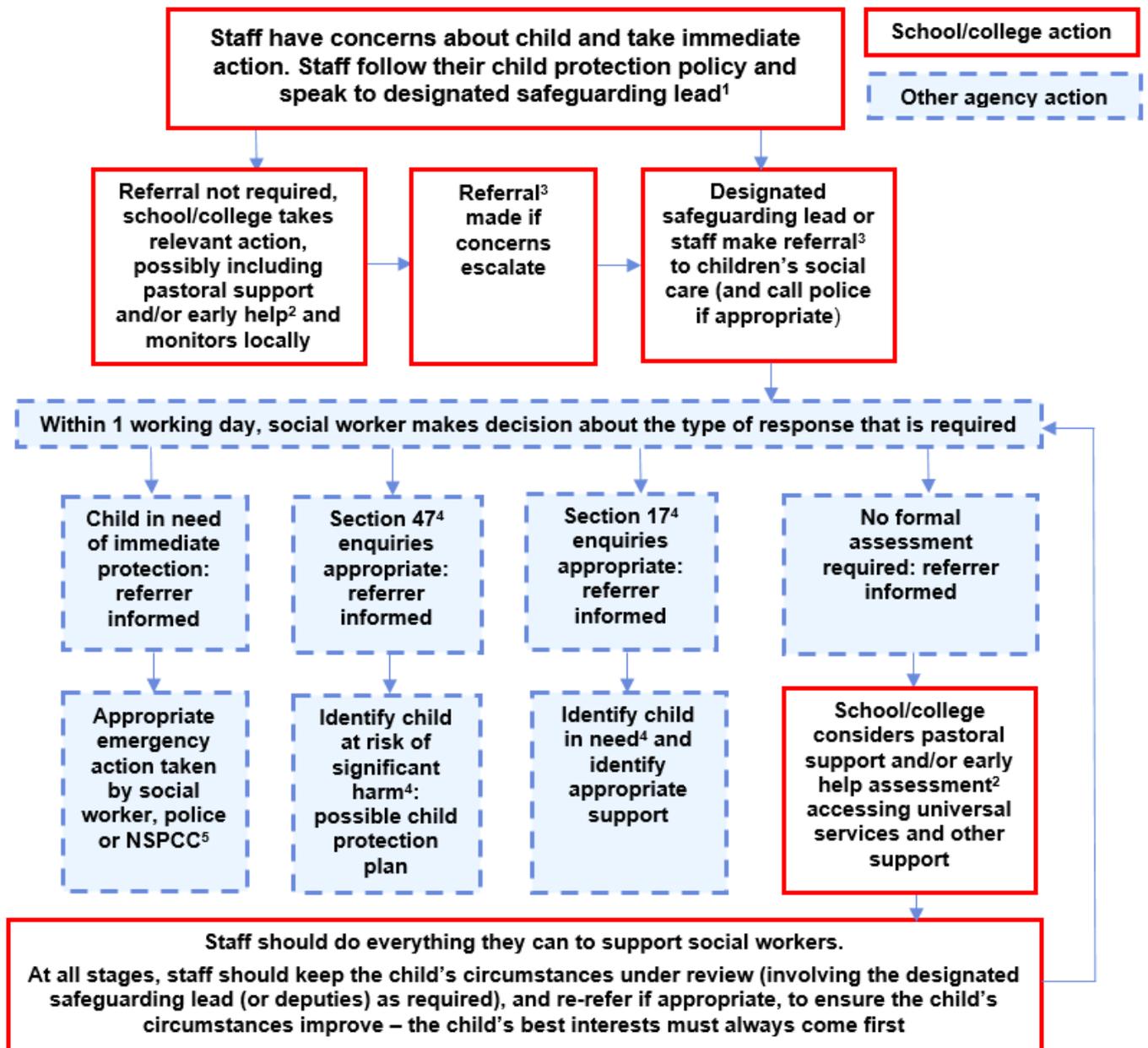
[Homelessness: how local authorities should exercise their functions](#)

[Private Fostering](#)

[Upskirting: know your rights](#)

ADDITIONAL INFORMATION 1 - Concerns about a child

Actions where there are concerns about a child (P17 KCSIE Sept 2020)



ADDITIONAL GUIDANCE 2 – Safeguarding Policy 2020



London Borough of Croydon
Code of Conduct

April 2015

CODE OF CONDUCT FOR SCHOOL BASED STAFF

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Code of conduct for school based staff

1. Scope and purpose

This code of conduct sets out the School's requirements of its employees. However, all those carrying out work for or on behalf of the School, including governors, temporary workers, interim staff, consultants, business partners and contractors are also required to adhere to the principles of the code. Councillors are covered by their own Code of Conduct.

The code of conduct is intended to ensure that all those working for the School are aware of standards expected of them and/or the School, specifically that they do not commit and are not open to allegations of inappropriate behaviour; favouritism, abuse of authority or conflict of interest.

The Code of Conduct and the associated guidelines should read in conjunction with the [Guidance to Schools relating to acceptable use of school monies](#) and the seven principles of Public Life, known as the Nolan Principles (See Appendix 5).

Governors are expected to observe the requirements of the Governing Body Code of Practice in addition to the Code of Conduct.

Teachers are also required to comply with the Personal and Professional Conduct requirements laid down in the Department for Education's most recent [Teachers' Standards](#) document in addition to the Code of Conduct.

The School's disciplinary procedure aligns with this code of conduct. **Failure to observe any of the standards in the code of conduct may lead to disciplinary action which could result in dismissal.** Breaches of the code by workers who are not directly employed by the School may be referred to their employer and they may be stopped from working for the School with immediate effect. The School may reconsider its contractual relationship with contractors/agencies who do not take appropriate action in the event that their workers breach the standards expected in this code.

Breaches of the code by Governors will be dealt with in accordance with the Governance Regulations and advice sought from Governor Services.

Please note that throughout this procedure the Head Teacher is defined as the officer to be notified. In cases where the Head Teacher is the "worker" then the person to be notified is the Chair of Governors.

Please note the inclusion of Section 18 on smoking as at April 2015. If the school has a separate smoking policy then it should select the relevant paragraphs and update their smoking policy accordingly.

2. Expectations

- Everyone who carries out work for the School in any role is the face of the School, be they a permanent or temporary member of staff, a contractor, one of our partners or a volunteer.
-
- Everyone working for the School:
 -
 - ✓ is using School money and resources in their delivery or support of services to the School community
 -
 - ✓ must display high standards of behaviour and conduct to instil public confidence in the integrity of the School as a whole
 -
 - ✓ must act and be seen to act in accordance with the trust the public places in them
 -
 - ✓ is expected to perform their duties with honesty, impartiality and objectivity and be held accountable for their actions
 -
 - ✓ is expected to declare any direct or indirect personal interest which may create, or be seen to create, a conflict of interest with their School duties
 -
 - ✓ is expected to behave in a manner, both at and outside of work, that will not bring the School's reputation into disrepute.
 -
- 2.1. It is the duty of all those working for the School in any form to familiarise themselves with this code, seeking clarity if uncertain about any of its content.
- 2.2. All workers have a responsibility to act in a way which ensures public confidence in their honesty and integrity. Public confidence can be affected by an individual's behaviour. The School seeks to maintain the highest standards of public confidence and requires the highest standards of behaviour from its workers. Workers must not conduct themselves in any way which might create doubt about their suitability to work for the School, or which has the potential to bring the School into disrepute or damage its reputation. Being charged, convicted or cautioned for criminal offences may mean that a worker is unsuitable for employment, even where there is no direct link between the nature of the offence and the work they undertake.
- 2.3. Perceived behaviour is also important in ensuring public confidence and workers must therefore act in a way that also avoids the appearance of any improper conduct or displays a conflict of interest. Workers must be able to demonstrate that their judgment and actions at work are objective and impartial and are not affected or influenced by personal considerations arising from any commitments and/or activities outside work.
- 2.4. The Governing Body are responsible for overseeing this code: the code of conduct is available on the School's website and a copy will be provided to all workers, contractors and agency staff on introduction of the code and for new employees when they are recruited. The code will also be shared with all contractors/agency workers when they are engaged to provide services to the School.

3. Respect for others

Workers must at all times act with the respect that the public and their colleagues are entitled to expect. To develop and maintain a positive, productive and embracing work environment it is important that colleagues treat each other well.

Workers must treat others professionally and with respect at all times and unlawful discrimination will not be tolerated (see *appendix 1*)

4. Declaration of interests

By declaring interests, workers help maintain public confidence, avoid any suspicion of impropriety and protect themselves against allegations of wrongdoing. Declarations should be made no matter how remote the interest is or if considered by the worker to be insignificant. Any workers who are in a position to influence decisions which taken by, or on behalf of, the School and have any interest in that decision must declare it to Head Teacher. Examples of interests where declarations will be needed include where a worker, their family or household members:

- a) Hold a directorship or share holdings in a company which either deal with the School or operate within the borough.
- b) Have a relationships in a private/domestic capacity with School colleagues, students, contractors or tenderers (see sections 8 and 14)
- c) Receive direct or grant-aided services from the School which the worker is in a position to influence (beyond universal services such as education).
- d) Have any significant family or other relationship with governors, clients, contractors or staff working at or with the School or its partners (see sections 8 and 14).
- e) Have membership of outside groups in the borough or groups receiving aid from the Council (see section 7).
- f) Have a non-financial interest within the borough such as a school governor or membership of an NHS trust board.
- g) Have an interest in planning or licensing applications; either in terms of submitting an application or in relation to an application for an adjoining or nearby property which they have the potential to influence.

It is the responsibility of workers to notify the Head Teacher, taking account of any changes in circumstances. Failure to do so may result in disciplinary action.

In addition, staff governors and staff with financial responsibilities are expected to make an annual declaration, whether a null one or not, in line with the Council's Scheme for Financing Schools.

5. Reporting responsibilities

- Like all organisations, we have a way of doing things at the School which we all need to adhere to because of government legislation - or simply because it's the way that the School has chosen to do business. The way we do things is often referred to as governance but could be more simply described as 'doing the right thing.'
 - Our governance framework is set within the School's constitution. The governance related advice makes it easy for you to do everything to standard and to escalate if something goes wrong.
- 5.1. Workers must ensure that they act at all times within their delegated authority as set out within the School's schemes of management and scheme of financial delegation. Workers must not make decisions (financial or non-financial) where they have no delegated authority to do so.
 - 5.2. In addition to declaring interests (as in 4 above) all workers **must** immediately inform the Head Teacher (or Chair of Governors if it is the Head Teacher that is the worker) in writing of all police cautions, warnings, reprimands, arrests and/or convictions received during their period of employment/engagement with the School. This information will be treated in confidence and used to assess any impact on the worker's job, including the appropriateness for the worker to continue in their role. A caution, warning, reprimand, arrest or conviction will not automatically mean that a worker is unable to continue in their job. Whether there is a conflict with the workers job will depend on a

number of factors including the nature of the offence, the type of job, the seniority of the worker and the extent to which the School's reputation or interests are damaged.

- 5.3. All workers have a duty to report any suspicion of fraud, theft, corruption, bribery or other wrongdoing by members of the public or School workers including colleagues, managers, governors, contractors, volunteers or partnership workers. Suspicions should be reported to the Head Teacher, the Chair of Governors, or in absolute confidence by following the School's whistleblowing procedure, or in the case of maintained Schools, to the Council's anti fraud team.
- 5.4. The School will not treat anyone less favourably because they have reported or intend to report wrongdoing, unless the complaint is malicious. Workers treating colleagues unfavourably in such circumstances will be liable to disciplinary action which could result in dismissal, as will workers who make malicious allegations. Non-School employees will be referred to their employer and/or their services stopped.

6. Political neutrality and activity

The following conditions apply to all those working for or on behalf of the School:

- 6.1. Personal political opinions must not interfere with providing balanced professional advice by/to Managers/Governors. Governors/Workers must not allow their political views to influence service delivery, nor must they impose those views on service users or colleagues.
- 6.2. Governors/ Workers who intend to undertake political activities should ensure that they are not in a role which forbids their proposed activities. If in doubt about the status of their role or about whether an activity is restricted, workers should seek written confirmation (email is considered sufficient) from their Head Teacher/Chair of Governors.
- 6.3. If a governor or member of staff intends to stand for election as a member of parliament or a Councillor for any authority they should advise their Chair of Governors* in writing. Failure to inform the Chair of governors may lead to disciplinary action being taken, which could result in dismissal.

** If Chair of Governors intends to stand they should inform the Council's Governor Services.*

7. Membership of other bodies

Workers are expected to consider carefully whether membership of, or association with, clubs, societies and other organisations such as lobbying groups and voluntary bodies could lead to the impression that their official position might be used to promote a private or personal interest or undermine equalities. If there is a chance that it could, they should declare it.

- 7.1. The school's nominated monitoring officer* will maintain a register of staff and Governors that belong to such organisations: membership must be declared to them.
- 7.2. Workers and Governors must in particular declare to the monitoring officer membership of any organisation or body which is or could be regarded as being:
 - a) A secret society
 - b) Discriminatory (See Appendix 1)
 - c) in a contractual or potential contractual relationship with the School
 - d) in receipt of benefit in cash or in kind from the School.
- 7.3. For the purposes of this code a secret society as mentioned in 7.2 is defined as one that:
 - a) Is not open to members of the public who are not members of that lodge, chapter, society, gathering, meeting or trust
 - b) Places an obligation on the part of the member to make a commitment (by oath or otherwise) of allegiance to the lodge, chapter, society, gathering, meeting or trust.
- 7.4. The freemasons can be cited as the obvious example of a secret organisation but workers are asked to consider whether their membership of any group or body might fall within the definition set out above. If in any doubt they should discuss this matter with the monitoring officer.
- 7.5. A lodge, chapter, society, trust, gathering or meeting as defined above should not be regarded as a secret society if it forms part of the activity of a recognised religion, trade union or professional association.

*The School has a monitoring officer who maintains a register of staff that belong to such organisations mentioned above and membership must be declared to them. If you are uncertain who the monitoring officer is please ask at the school office.

8. Misuse of position

All workers must maintain the highest standard of integrity in all relationships both inside and outside the School.

- 8.1. Anyone working for the School must not, either in their professional or personal capacity, use their position improperly to gain an advantage or disadvantage any person or organisation.
- 8.2. If a worker is in a position to influence any decisions which are taken by, or on behalf of, the School and they have any interest in that decision, however remote, they must declare it; this includes membership of voluntary bodies who could be receiving School grants.
- 8.3. No special favour may be shown to current or former colleagues or their partners, friends, relatives or associates when awarding contracts to private or other businesses run by them or who employ them in any capacity.
- 8.4. Workers must ensure that they declare to their Head Teacher any personal interest which may impinge on their impartiality to apply these regulations. Any arrangements which might, in the long term, prevent (or be seen to prevent) the effective operation of fair competition must be avoided.
- 8.5. Workers must not lobby members of the Governing Body or members of the Council on individual or personal employment matters including those associated with recruitment of themselves or others.

(Also see section 15 for standards relating to accepting gifts and hospitality)

9. Safeguarding

The School is committed to safeguarding children and vulnerable adults and expects exemplary behaviour and work in relation to safeguarding. All workers have a duty to safeguard and promote the welfare of children, young people and adults at risk.

- 9.1. When recruiting to posts affording access to children and vulnerable adults managers/Governors must follow the School's procedures to ensure safe recruitment.
- 9.2. All workers are required to ensure they are familiar and compliant with the relevant national, Local Authority and School professional boundaries, codes of practice and legislation related to their job including data protection, safeguarding & child protection.
- 9.3. All workers are expected to report any concerns of a safeguarding matter or acts/suspicion of abuse against children or vulnerable adults irrespective of whether this is inside or outside of work.

10. Finances and the use of School and other public resources

Workers must use School funds responsibly and lawfully and only for their designated purposes.

- 10.1. It is a criminal offence to defraud the School or its customers or partners: any such activity will be reported to the relevant authority (such as the police or HMRC) and the worker will be subject to disciplinary action which may result in dismissal.
- 10.2. School facilities may not be used for workers' personal or outside interests without prior agreement. This includes, but is not limited to, funding, buildings, vehicles, furniture, tools, telephone lines and internet connections, ICT equipment. Minimal personal use of low value resources, for example making an occasional short telephone call, is allowed.
- 10.3. Intellectual property, including research, reports, designs, drawings, software, etc created for work purposes are the property of the School. They should never be removed from the workplace without the permission of the Head Teacher. The only exception to this is when staff take things home in order to work on them, which is permissible so long as the property is returned to the school upon completion of the work.
- 10.4. All workers have a general responsibility for ensuring that the School's assets under their control are secure and that use of these assets is legal, properly authorised and achieves good value for money. All expenditure incurred should be compliant with the Scheme for Financing Schools, School's Financial Regulations, Financial Procedures, Contracts Handbook and Tenders and Contracts Regulations. Workers must also ensure that they act within the School's Scheme of Financial Delegation and only approve expenditure where they have been delegated the appropriate authority to do so.

11. Communications, electronic media and social networking

The School uses a variety of methods to communicate with its workers, students, service users and the community and to deliver services, including external and internal post and telephones, photocopying and printing, fax, email, internet, 'Fronter' or social media. These facilities are provided for School business purposes only.

Communications using School facilities may be intercepted, recorded and monitored for business use and where appropriate for the detection and prevention of crime. This includes, but is not limited to, telephone calls, internet use, email and post.

The standards set out in this code apply to the use of electronic media such as email, internet, blogs and social networking sites the same as they would to traditional media such as newspapers, television and radio.

- 11.1. Workers must abide by School policies and procedures relating to the security of information, data protection and use of electronic media, including email and the internet.
- 11.2. Any use of social media such as Facebook, Twitter, LinkedIn, etc, during working time should be restricted to work related use only. Limited personal use of these types of sites and access to personal email is allowed during worker's break periods only but the standards set out in this code apply.
- 11.3. Whether at work or not, workers must not use social media to:
 - post information which is confidential or which constitutes intellectual property
 - make negative comments about the School, its services, workers, customers or anyone linked to the School
 - harass or bully other workers (cyber bullying)
 - make discriminatory comments of any kind about anyone linked to the School
 - post pictures or details of School students or colleagues without their express permission.
 - communicate with students.
- 11.4. Workers must not;
 - use their personal telephones (mobile or landline) to communicate with students and should only use School systems for any such communication; or
 - provide students with their personal telephone numbersunless given express consent to do so by their Head Teacher.
- 11.5. Workers must notify the Head Teacher immediately if a student attempts to contact them on their personal telephone or via a social network

12. Confidentiality and data protection

The definition of what constitutes a confidential document is wide. Workers are required to take their duty of confidentiality seriously and ensure the confidentiality of all information. All workers need to be mindful of the requirements of the Data Protection Act and should familiarise themselves with the School's policies in this regard which are available on request.

- 12.1. The confidentiality of all information received at work must be respected and never be used for personal advantage or gain. Information given out in the course of a workers duty must be true and not misleading.
- 12.2. Workers with access to confidential information should not disclose that information to any other party or organisation unless authorised to do so. This is particularly important in the case of information relating to action taken in relation to conduct, capability, procurement, tender and contract costs (including those for in-house providers).
- 12.3. Access to information may be allowed to those who have a legal entitlement; such as the police as part of a criminal investigation. Workers providing such information have a duty to verify the identity of the person or organisation requiring the information.
- 12.4. If a worker is unsure whether information can be disclosed they should seek confirmation from the Head Teacher.
- 12.5. Workers must not transfer confidential information to their private email addresses without the prior knowledge or consent of their manager.
- 12.6. Workers have a responsibility to ensure that electronic and paper data and information is kept secure at all times. Confidential information should not:
 - be left unattended if being taken between home and work or between work places;

- be taken to entertainment or public places, such as cafés, restaurants, pubs and cinemas;
- be discussed where there is a possibility of being overheard.

Loss and misuse of information and data is a serious offence and is likely to result in disciplinary action which may lead to dismissal.

12.7. Misuse by a worker on leaving the School will be addressed through legal routes. (Also see section 19 for contact with the media)

13. Personal financial affairs, data and pay

- 13.1. Workers must not conduct their personal financial affairs so that the School or another public body is defrauded or is otherwise denied the income and/or other resources to which it is entitled by law.
- 13.2. Workers have a responsibility not to be in debt to the School for any reason. In the event that such debt arises through genuine error or mistake, workers are required to make arrangements acceptable to the School for repayment of the debt.
- 13.3. Workers should check their pay on every payment occasion, reporting any anomalies to their Head Teacher and payroll provider immediately. Overpayments and underpayments will be rectified or made good. It is in the worker's interests to have this arranged as soon as possible.
- 13.4. Income tax is a personal responsibility and the School will not be liable for any underpayment of tax. It is each individual's responsibility to ensure that the tax code on their pay slip is correct and any errors should be reported to the payroll provider as soon as possible.
- 13.5. It is the personal responsibility of every worker to ensure the School has their up to date personal contact details. Personal contact details may be needed for a variety of business reasons including consultation, informing of contractual changes, contact during periods of absence and/or in an emergency. The School will not be held responsible for a worker's failure to update their own information. Changes should be done on the appropriate electronic system or through the appropriate school officer if the worker does not have access to that system.

14. Relationships

Workers are expected to develop and maintain a co-operative and professional working relationship with governors, colleagues, contractors, suppliers and service partners at all times. Personal relationships often develop in the work place and these can cause a number of issues for the School, the wider workforce and the individuals concerned. All our workers should feel confident of fair and consistent treatment without the fear that a relationship will influence their or other workers' treatment or wider working relationships.

Governors

- 14.1. Workers are responsible to the Governing Body through its senior managers. Mutual respect between workers and Governors is essential to good governance. Familiarity must be avoided to ensure the relationship retains a professional balance. Workers must not approach Governors over personal employment issues and doings so may be regarded as an abuse of position as referred to in section 8.

Contractors and suppliers

- 14.2. Workers must declare any external relationships of a business or private nature with external contractors or suppliers or potential contractors and suppliers to the monitoring officer.
- 14.3. Workers who authorise, engage or supervise contractors or have any other official relationship with contractors and have previously had or currently have a business or private relationship with a contractor who is engaged or who is proposed to be engaged by the School, should declare that relationship to the monitoring officer as soon as practicable. The monitoring officer should declare any interests to the Head Teacher.

- 14.4. When tendering, workers must declare any interest (and interest of their spouse, partner, family member, friend or associate), business or private relationship or association with any School contractor or potential contractor.

Parents, carers, students (service users) and the community

- 14.5. Workers should always remember their responsibilities to the community they serve and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community.

Workers must maintain professional boundaries and avoid developing inappropriate personal relationships with service users. In particular, the development of unprofessional personal relationships or friendships with vulnerable service users, such as borrowing and lending money, giving and receiving monetary or extravagant gifts, sexual intimacy, or showing preferential treatment to service users will be regarded as a misuse of position no matter how well intended. In exceptional circumstances, such as where a pupil has to be lent money to cover their fare home, the loan will be acceptable but the worker lending the money must declare it immediately.

Work colleagues

Personal relationships (such as family, intimate or close personal friends) between people in the same team, division or department, or between a line manager and one of their team or other person they may have influence over, are potentially problematic and should be avoided where possible, or managed appropriately where it cannot be avoided.

- 14.6. Relatives, spouses, partners or close personal friends are not allowed to be involved in the processes and decisions relating to employment issues, including but not limited to: appointment, performance; discipline; authorising financial payments; determining pay or conditions of employment.
- 14.7. Workers responsible for the appointment of staff must ensure that decisions are based on merit and not on anything other than ability to do the job. Similarly, they must not canvass on behalf of any applicant. If a candidate is known to a worker but is not a relative, spouse, partner or close personal friend, they may sit on the interview panel, but must declare the relationship to other members of the panel prior to the interviews. This applies to the appointment of permanent and temporary staff, including agency workers and consultants.
- 14.8. Workers must declare any personal relationships that exist or develop, in the circumstances detailed in 14.7 and 14.8 above, to the monitoring officer.
- 14.9. Abuse or misuse of a relationship is likely to invoke disciplinary action, which may lead to dismissal.

15. Gifts and hospitality

To maintain integrity, reduce vulnerability and comply with the Bribery Act 2010 (<http://www.bis.gov.uk/anticorruption>) the School will not tolerate any form of bribery by, or of, its workers or anybody acting on behalf of the School.

The School's guidance regarding gifts & hospitality ([Appendix 3](#)) should be read in conjunction with this code of conduct as there are strict processes for receiving and rejecting offers of gifts and hospitality. The Head Teacher is responsible for deciding individual cases, in conjunction with the Chair of Governors.

- 15.1. All gifts (excluding very small gifts with a value of less than £1) and hospitality offered, whether accepted or refused, must be recorded on the School's hospitality register.
- 15.2. It is not permitted for anyone working for the School to receive or give any unauthorised gift, loan, fee, reward or advantage or show favour or disfavour to anyone else, although receipt of end of term gifts may be an exception (Please see Appendix 3, Section c) for further guidance). This applies to workers in their official and personal capacities.
- 15.3. Workers should not accept personal gifts from contractors and outside suppliers, although items of small value such as pens or business diaries may be accepted, but

must be recorded. Only with the express authority of the Chair of Governors should hospitality extend beyond these parameters.

- 15.4. If returning or refusing a gift would cause offence, Head Teachers can arrange for it to be received by the School on behalf of the Governing Body and pass the gift(s) to them, to be used for fundraising.
- 15.5. Workers should generally not accept hospitality (e.g. food, drink and business lunches) linked to their employment. In exceptional circumstances and with the prior approval of the Chair of Governors, modest hospitality can be accepted but must be recorded.
- 15.6. Offers of entertainment (e.g. sports events, theatre tickets and hotel accommodation) must not be accepted without the express authority of the Chair of Governors.
- 15.7. Where an outside organisation wishes to sponsor an activity by invitation, tender, negotiation or voluntarily, the basic conventions concerning acceptance of gifts and hospitality must apply. If there is any doubt between what is and is not acceptable in terms of gifts or hospitality, the offer should be declined.
- 15.8. Workers providing personal care/support can be particularly vulnerable in this respect. If they are offered any gifts or bequests from students (or students' families) they must inform their Head Teacher. Such items must not be accepted unless the Head Teacher provides prior written approval to do so and should be treated as set out in para.15.3.
- 15.9. Disregarding the School's processes regarding gifts & hospitality is likely to result in disciplinary action which may lead to dismissal.

16. Business Expenses

The environmental and cost impact of different modes of transport must be considered when deciding whether to attend off site meetings.

- 16.1. School workers are permitted to claim limited reasonable expenses for certain travel and related costs incurred in the course of their employment as detailed in the School's procedures.
- 16.2. Workers are responsible for ensuring that any expenses incurred during the course of their work are kept to a minimum and are authorised in advance unless it is impractical to do so. When travelling by public transport, workers are expected to travel using the cheapest fare available, unless authorised otherwise in advance. Under no circumstances should workers claim for home to work travel.
- 16.3. The standards relating to expenses apply in the same way irrespective of whether the expenses incurred are funded externally.
- 16.4. Workers who are provided with mobile phones or PDAs are responsible for identifying and paying for all call charges relating to any personal use of the equipment.

17. Alcohol and drugs

- 17.1. Workers in possession of illegal drugs or using illegal drugs whilst at work will be reported to the police and subject to disciplinary action, which may result in dismissal.
- 17.2. The use of alcohol and/or drugs must not impair the performance of contractual duties and safe, efficient and effective service delivery.
- 17.3. With the exception of work-related events, where provision of alcohol has been authorised, alcohol must not be consumed during working hours.
- 17.4. Alcohol, drugs or substances consumed outside of or during working hours must not affect a worker's ability to do their job or have the potential to damage the School's reputation or the worker's own credibility. Presenting for work with clothing or breath smelling of alcohol or drugs is likely to raise reputational concerns that may lead to disciplinary action.
- 17.5. Workers deemed to be under the influence of any substance likely to compromise safety or service delivery may be subject to drug and alcohol testing and/or disciplinary action which may result in dismissal.

- 17.6. Workers who suspect a colleague of being under the influence of alcohol and/or drugs at work must report this to their line manager or to a more senior manager if it is their line manager under suspicion.
- 17.7. The Council's drug and alcohol policy aligns with this code of conduct.

18. Smoking

The school should select the relevant paragraphs below and update their smoking policy accordingly.

18.1 The school recognises that the health, safety and welfare of children, workers, sub-contractors and anyone else directly affected by the school's operations are of prime importance. The school also recognises that employees are often seen as role models to pupils.

[18.2 Smoking is therefore strictly prohibited on all parts of the school's premises, including at entrances or anywhere on its grounds. This includes areas that are outside but that form part of the school's premises.

18.3 *The school does not permit workers to smoke in school vehicles.*

E-Cigarettes

18.4 *Although they fall outside the scope of smoke-free legislation, the school prohibits the use of e-cigarettes in the workplace and the same restrictions on smoking will also apply to e cigarettes.*

The school's rationale for a ban on e-cigarettes is that:

although they do not produce smoke, e-cigarettes produce a vapour that could provide an annoyance or health risk to other workers;

some e-cigarette models can, particularly from a distance, look like real cigarettes, making a smoking ban difficult to police, and creating an impression for [children/visitors/customers/other workers] that it is acceptable to smoke.]]

OR

[18.2 Smoking is prohibited within the school's premises, except in certain designated outside areas. Workers may smoke only in [explain where permitted areas are located/the school's outdoor smoking shelter at [location]]. The school provides receptacles for smokers to dispose of cigarette butts and other smoking waste at all outside locations where smoking is allowed.

18.3 Workers who go outside to smoke are restricted to taking one short smoking break in the morning and one in the afternoon, with a maximum of ten minutes per break. Workers should inform their manager if they wish to take a smoking break and ensure that there is sufficient cover before taking a break.

18.4 The school does not permit workers to smoke in school vehicles.

E-Cigarettes

18.5 Although they fall outside the scope of smoke-free legislation, the school prohibits the use of e-cigarettes in the workplace and the same restrictions on smoking will also apply to e cigarettes.

The school's rationale for a ban on e-cigarettes is that:

although they do not produce smoke, e-cigarettes produce a vapour that could provide an annoyance or health risk to other workers;

some e-cigarette models can, particularly from a distance, look like real cigarettes, making a smoking ban difficult to police, and creating an impression for [children/visitors/customers/other workers] that it is acceptable to smoke.]]

For further details please refer to the schools smoking policy.

19. Additional work

Off duty hours are the personal concern of individual workers but they should not allow their private interests to take priority over their work interest. Workers should not put themselves in a position where their duty and private interests conflict. Private interests in this regard include activities of a voluntary nature as well as business or recreational interests. This does not preclude tuition outside of school hours.

It is not the intention of the School to prevent workers from undertaking additional employment unless that employment conflicts with or detrimentally affects the School's interests, weakens public confidence in the conduct of the School's business, or affects a worker's ability to undertake their work.

- 19.1. Workers should not undertake outside work related to any matter which is or could be undertaken by the School, without the permission from their Head Teacher.
- 19.2. A worker who wishes to take on any kind of additional work, paid or unpaid, in any capacity, must ensure that:
 - a) Where there is a potential conflict of interest for the School they inform their Head Teacher in writing for assessment.
 - b) their combined working arrangements do not exceed the provisions of the working time regulations for weekly working hours, allow for the daily and weekly rest required by working time regulations or cause other concern in terms of health and safety at work.
 - c) the work does not place them in a position where their School duties and private interests conflict
 - d) the work does not damage public confidence in the School's conduct or business
 - e) the work does not involve being in direct competition with the School for contracts/work
 - f) any potential employer is made aware that they are already employed by the School.

20. Contact with the media

Although an open and transparent organisation, the School restricts workers from making public comment on issues relating to the School as they might be deemed to have been made on behalf of the School.

- 20.1. Workers are not allowed to discuss issues with the press or public or disclose information or documents on School business unless expressly authorised to do so by the Head Teacher or the Chair of Governors. Unless authorised to do so, workers must not speak, write or give interviews to the media. If approached by the media, workers should refer the enquiry to the Head Teacher.
- 20.2. The branch secretaries or corporate staff side leads of the recognised trade unions have specific permission to liaise with the media on behalf of their respective trade unions.
- 20.3. School workers should not bring the School's name into disrepute by publicising any material which is against the interests of the School or is defamatory to representatives, Governors, partners, pupils or work colleagues.
- 20.4. The standards set out in this document apply in the same way to information published and comments made through electronic media including email, the internet, social networking sites and blogs, as they do to traditional written media, newspapers, radio and television.

21. Further information

- 21.1. If you are in any doubt with regard to the provisions of this code and how they apply in any particular situation, you should seek advice from your Head Teacher or the Chair of Governors.

Appendix 1: Standards of Behaviour

Standards of behaviour

All School workers are required to be aware of the School's equalities and diversity policies and to comply with and implement them in all aspects of their work.

All workers, volunteers and customers are entitled:

- to be treated with dignity, respect, courtesy and fairness
- not to be bullied, harassed or victimised
- not to experience any form of unlawful discrimination

The School will not tolerate unfair, offensive or unlawful discriminatory behaviour or bullying. Workers must not engage in such behaviour, which may be regarded as a serious disciplinary offence which could lead to dismissal.

Discrimination and offensive behaviour

By law people are protected from discrimination on the grounds of protected characteristics listed in the Equality Act 2010:

- race
- sex
- disability (or because of something connected to a disability)
- religion or belief
- age
- sexual orientation
- gender reassignment
- pregnancy or maternity
- being married or in a civil partnership

Discrimination can take a number of different forms:

Treating a person **worse** than another person because of a protected characteristic (this is called **direct discrimination**).

Doing something which has (or would have) a worse impact on a person and on other people who share a particular protected characteristic than it has on people who do not have the same characteristic. This form of discrimination may not be unlawful if it can be shown to be **objectively justified**.

Treating a person **unfavourably** because of something connected to their disability where you cannot show that what you are doing is **objectively justified**. This is called **discrimination arising from disability**.

Treating a person worse than another person because they are **associated with** a person who has a protected characteristic.

Treating a person worse than another person because you think they have a protected characteristic (**perception**).

Treating a person badly or **victimising** them because they have complained about discrimination or helped someone else complain or have done anything to uphold their own or someone else's equality law rights.

Harassment: often related to bullying, this is unwanted behaviour towards another person, that:

- has the effect of violating that persons dignity or
- creating for that person an intimidating, hostile, degrading, humiliating or offensive environment.

The unwanted behaviour may be related to a protected characteristic or be of a sexual nature. It may also be less favourable treatment because of submission to or rejection of previous sex or gender reassignment harassment.

Any unwanted, unwelcomed and unreciprocated behaviour which undermines a person's dignity/feelings at work is unacceptable to the School. This includes behaviour which might unreasonably threaten a person's job security or promotion prospects or create an intimidating working environment.

If any behaviour towards a person working for the School from another person at work including a customer, Governor or contractor has overtones which the recipient reasonably finds offensive, the recipient has the right to have it stopped.

Unacceptable behaviour can take many different forms and can range from physical attack to more subtle conduct. It includes: actions, jokes, or suggestions which might create a stressful working environment and; the production, distribution, display or communication and discussion of material such as books, posters, magazines, newspaper articles, photographs, videos, computer generated imagery etc which may give rise to offence.

Unacceptable behaviour does not include legitimate actions by a manager to encourage a worker to perform their duties or manage their performance. It also excludes legitimate actions taken within disciplinary or other formal procedures. It does not exclude persons in authority who use their position to bully, abuse or harass others, or who assume a threatening or intimidating management style.

There is no definitive explanation of what constitutes offensive behaviour. The effect it has on the recipient is what defines it as offensive. This following list can therefore only be used as a guide to help workers understand what behaviour could be deemed offensive, whether it is intentional or not. The examples are indicative and not exhaustive.

Type	Description	Examples
Sexual harassment	Unwelcome sexual advances, requests for sexual favours or other conduct of a sexual nature	Gestures, leering, getting too close, hanging pin-ups, bringing in offensive publications, writing offensive letters or memos, giving unwanted gifts, using

Type	Description	Examples
Racial harassment	Derogatory remarks, racially explicit statements, graffiti, jokes or any other action of a racist nature which results in the recipient(s) feeling threatened or compromised.	suggestive language, making unwanted propositions, telling sexually explicit jokes, using affectionate names, asking personal questions, groping, touching, using innuendos, indecent exposure and/or screen savers Gestures, facial expressions, offensive publications, graffiti, threats, racial abuse, racist jokes, nicknames, labels, assault.
Disability harassment	Derogatory remarks, staring, mimicking, invasive personal questions, ostracising or patronising which is directed at any individual with a disability, or groups of disabled people, which results in their feeling threatened or compromised.	Mimicking, ignoring wishes or feelings, ostracising, staring, laughing at a disability, copying a speech impairment, inappropriate terminology (e.g. cripple or spastic, personal questions, jokes, patronising comments, nicknames, unwanted moving of a wheelchair, hiding a disability aid, touching a visually impaired person.
Religious belief harassment	Behaviour which fails to acknowledge and respect the rights or needs have people’s religious beliefs or practices.	Mimicking, staring, drawing offensive symbols , hanging offensive images, making fun of headgear (e.g. skull cap, turban , hijab) criticism for taking religious holidays off, offensive name calling, assault, removing religious objects
Equality-related conflict	The School recognises that people have the right to hold different religions and beliefs and will make reasonable provisions to help employees practice their religion or belief e.g. through flexible working hours and providing a quiet area for prayer. Practicing a religion or belief at work in a way that may cause offence or treats people differently because of their protected characteristic is unacceptable and may	An employee shares a workstation with a gay man who openly discusses his lifestyle and relationship with another man. The employee requests to move on the basis that her religion regards such behaviour as sinful and contrary to the laws of her God. Such a request may be perceived as offensive towards the gay man. Some individuals may be guided by their religion or culture not to shake hands as a greeting. To avoid causing offence individuals should ensure that they greet all people in the workplace in the same way, irrespective of their race, gender, age, religion, sexual orientation etc.

Type	Description also be unlawful.	Examples
Age harassment	Ridiculing or demeaning behaviour focused towards people because of their age	A counsellor declines to provide a service to a same-sex couple on the grounds that such relationships are immoral according to his religion. Such behaviour conflicts with the Council's statutory duty to eliminate discrimination and promote equality and is not acceptable.
Sexuality harassment	Behaviour which condemns or ridicules people because of their sexuality	Offensive letters/memos , threats, insults, jokes or comments, personal questions, gestures, starting fights, deliberate body contact, practical jokes, verbal abuse
Harassment related to gender reassignment	Behaviour which condemns or ridicules people because of their gender reassignment	A transsexual woman is subjected to offensive 'banter' at work, relating to her gender reassignment. This creates a hostile and offensive atmosphere for her, and is likely to be harassment
Bullying/Singling out	Bullying often results from a misuse of management power, but it can also be the misuse of any form of individual power, such as physical strength, personality or age, or collective power through strength of numbers. More than a strong or authoritarian management style, it is destructive rather than constructive, it is criticism of a person rather than their mistakes, it publicly humiliates rather than privately corrects them and it results in them feeling threatened or compromised.	Ostracising/freezing out, withholding essential information, resources or training, setting impossible tasks, needlessly changing priorities or objectives, unreasonable allocation of duties, deliberate wrongful attribution of blame, shouting, swearing, abuse, nicknames, malicious gossip, public reprimanding or humiliation, belittling or patronising comments, persistent reminders of past failures, unnecessary phone calls to someone's home, hitting or grabbing a person, pushing, jostling, practical jokes, initiation ceremonies, damaging or stealing property.
Victimisation	Where a person is treated less favourably than another because he/she has brought	A worker helps a colleague with a sexual harassment complaint against another worker. Because of this, their manager

Type	Description	Examples
	proceedings, given evidence or information, rejected advances or complained about the behaviour of someone who has been harassing, discriminating against, or in some other way intimidating them.	marks them down at their annual appraisal on the basis they are 'not very loyal'.

How to Complain

If a worker is personally subject to or witness behaviour which is against the School's standards of behaviour they should discuss this with the person concerned to try to resolve the issue informally. If a worker feels that informal resolution is not possible or appropriate they may raise a formal complaint can be raised via the School's grievance procedure. The complaint will be investigated and disciplinary action taken if the allegation is proven.

If a worker witnesses behaviour which is against the School's standards of behaviour they should initially try to resolve the matter informally with the person concerned. If they do not feel that informal resolution is possible or appropriate they should raise the matter with a senior manager such as the Head Teacher.

Responsibilities

It is the School's responsibility to :

- review, revise and ensure implementation and monitoring of policies and procedures

It is Governors' responsibility to:

- support the principles and practice of equality and diversity policies
- ensure that School services are available to all members of the community
- treat all workers and customers with dignity and respect
- ensure the School's commitments are communicated effectively
- ensure that senior management observes its responsibilities in that behaviour towards staff at all levels does not involve any form of harassment or discrimination.
- arrange for provision of specialist advice and training for managers and staff at all levels
- ensure that the School has equalities and diversity policies and set guidelines for the implementation and operation of those policies.

It is the Head Teachers' responsibility to ensure that :

- the School's commitment to equalities and diversity is communicated
- that they and their staff comply with the School's standards of behaviour
- all managers apply policies and practices fairly and consistently
- services provided are available to all members of the community
- speedy and appropriate action is taken to deal with offensive behaviour

It is all workers' responsibility to:

- understand what the standards of behaviour require of them
- make sure that their own conduct does not cause offence or misunderstanding
- stand up to behaviour that they find unacceptable
- support colleagues who are being harassed, bullied, victimised, or being discriminated against

It is all managers' responsibility to:

- treat all workers and customers with dignity and respect and be alert to, and correct, unacceptable behaviour within the workplace
- ensure that all workers and volunteers are aware of the standards of behaviour required of them and know how to raise issues
- support workers if they witness unacceptable behaviour by customers by explaining politely but firmly that such behaviour is unacceptable
- deal with any complaints or allegations which come to their attention appropriately, effectively and confidentially, respecting the rights of all relevant parties
- ensure that complainants are not victimised or retaliated against for complaining

Appendix 2 – Acceptable standards of appearance

Acceptable standards of appearance at work

Overview

As a representative of the School, a worker's appearance impacts on the School's image. Inappropriate dress can suggest that workers have little regard for their service delivery or their customers; consideration should always be given to public perception.

The School imposes a particular style of dress only where protective clothing and uniforms are required. Whilst there is no desire to impose a style of dress elsewhere, standards appropriate to the effective delivery of our services are necessary.

The School recognises that it employs workers from a wide range of backgrounds, cultures, ages and tastes, who wish to exercise choice in the way they dress. The School accepts that adjustments may sometimes be necessary due to health, cultural or religious considerations.

Scope

1. This standard applies to all those working for the School (employees, agency and interim staff, consultants, partners, contractors, Governors and volunteers), including those who do not frequently meet the public. Those required to wear uniforms or protective clothing are equally required to comply.
2. It is recognised that conventional business dress may not be appropriate to the School environment. As such, the Governing Body expect the standards outlined below to be maintained by all staff.
3. This standard forms part of the contract of employment so must be adhered to. An inappropriately dressed worker may be sent home to change. Repeated breaches of the standard may lead to disciplinary action being taken. Workers who are sent home to change will be deducted pay for the time taken to do this, subject to the application of the disciplinary procedure.
4. Workers may follow the traditions of their cultural/ethnic/religious background provided they are safe and appropriate to the job.

Standards of appearance and dress applicable to all workers at all times

- a high standard of cleanliness and personal hygiene
- a standard of dress which promotes the professionalism of the organisation and is appropriate for the work being carried out
- School name/I.D. badge worn visibly at all times, as directed by the Head Teacher.

Workers who are required to wear uniforms or protective clothing

- Only uniforms or protective clothing issued by the School may be worn. No substitutes are to be made. Any alterations for religious or health reasons must be agreed with the line manager and must be compatible with the colour and style of the uniform as well as offering the same level of protection.
- It is the duty of each worker to keep all items of their own uniform and protective clothing clean, pressed and in good repair.
- Workers must not allow anyone else to wear their uniform and/or protective clothing and must return all items when they leave the School.
- The uniform/protective clothing must not be worn outside work hours, except when travelling directly to and from work.
 - Managers are responsible for ensuring that replacement of uniform/protective clothing is made available when given reasonable notice.
- Breaches are likely to lead to the worker being sent home to change into their correct uniform/collect their protective clothing. This is likely to be unpaid time and disciplinary action will be considered (see also paragraph 3 above)

Workers who are not required to wear uniforms or protective clothing

- The standard allows for both formal and informal business dress.
- The choice of formal or informal business dress should be made by each worker according to the requirements of each working day.
- There will be occasions when formal business attire is required for some workers. For example when meeting visitors/representatives from other organisations. This does not necessarily mean a suit but does mean smart business- attire.
- Suitable footwear is to be worn.

- Whilst the School wishes to be flexible, the following are examples of items which are **not considered acceptable**:
 - shorts or very short skirts/dresses
 - cropped tops which expose the midriff
 - low cut or strappy dresses or tops
 - any clothing bearing political or potentially offensive messages or logos
 - clothing with rips/tears
 - beachwear such as vest tops, flip-flops and shorts

It may be acceptable in some circumstances for casual clothing and/or sportswear to be worn at work, for example:

- staff who are primarily engaged as Sports Instructors or to teach PE.
- staff who are delivering, or assisting in the delivery of, a PE lesson.
- when attending work social events or preparing for accommodation moves/housekeeping.
- when participating in exercise before and/or during the working day, bringing a change of clothing, as appropriate.
- where there is a local agreement that casual clothing and/or sportswear improves accessibility with service users.
- when attending some off site training courses
- where there is a local agreement to allow periodic 'dress down' days in the workplace

If in doubt, check with your manager what is acceptable.

Appendix 3 – Guidance re gifts etc

GUIDANCE REGARDING GIFTS, HOSPITALITY AND ENTERTAINMENT

The Code of Conduct (the Code) for School staff sets out the standards of conduct expected of School staff in their business activities and in the link between work and their private lives. It incorporates legislation and good practice setting standards of behaviour and integrity for School employees.

These procedures are mandatory and apply to all staff, volunteers, interims and agency staff. The procedures should be read in conjunction with the Code of Conduct and the Council's Anti-Bribery Policy.

What is a gift, hospitality or entertainment?

This includes a gift, hospitality or entertainment (including invitations to cultural and sporting events), monetary or otherwise, provided to any School worker (either directly or to a spouse, partner or family member) as a result of them being a School worker. This includes, but is not limited to:

- Goods and other items;
- Services;
- Attendance at cultural, sporting and other events;
- Meals, drinks and other hospitality; and
- Accommodation.

Some exceptions do exist, such as items provided at conferences that are provided to all delegates; **however, where staff are unsure whether an exception may apply, the Code requires that the offer be declined.**

Where clarification is required this should be sought from the School's monitoring officer.

General steps

If you are offered gifts, hospitality or entertainment, whether accepted, refused or returned the following steps are required to be taken:

1) Accept, reject or return the gift and hospitality

The Code of Conduct states that as a general principle hospitality or entertainment of any sort should not be accepted and that you should not accept **significant** personal gifts.

a) Entertainment (e.g. sports events, theatre tickets and hotel accommodation)

This should not be accepted. Any exceptions are likely to be rare and will require the prior express approval of the Chair of Governors,, based on the submission of a business case showing a clear benefit to the School.

b) Hospitality

The Code of Conduct states that, as a general principle, hospitality should not be accepted. The Code does allow for modest hospitality* to be accepted in two circumstances, namely:

Where the hospitality is funded by a professional or voluntary group and in the latter case is part of the life of the community

Where there is an existing business relationship with a contractor and a modest business or working meal is offered as part of that relationship.

Where hospitality is accepted this should wherever possible be approved in advance by your Chair of Governors and should be recorded within the Hospitality Register.

For the purposes of the Code it is considered that hospitality of **less than £35 per head in value could be considered modest. This limit might be exceeded at awards ceremonies, conferences or similar public sector events which should be attended only with prior approval of your Chair of Governors and where relevant to School business. Such cases must still be recorded in the register whether accepted or not.*

Only with the express written authority of the Chair of Governors should hospitality go beyond this and great care should be taken that no hospitality is accepted when purchasing decisions are under consideration.

c) Gifts

The Code states that you should not accept significant personal gifts. Gifts of alcohol should not be accepted except in the circumstances detailed below regarding the end of term.

The exception to this is at the end of term, when it is recognised that it is common for parents/carers/students to give gifts to staff, as a sign of appreciation. In these circumstances a gift of alcohol (e.g. a bottle of wine) may be accepted but must be recorded in the Hospitality Register and should only be consumed in circumstances compliant with 17.3 of the code of conduct.

Items of small value, considered for the purposes of the Code to be of **less than £10 estimated retail value**, may be accepted (including those which incorporate the supplier's logo in some form or another) but must be recorded in the Hospitality Register .

Collective gifts - These can occur when a person is unwell, reaches a particular milestone, or is leaving the school. In such circumstances the retail value of a gift may exceed the limits defined in this Code but must be recorded in the Gift Register as a collective gift.

Exceptionally, if returning a gift would cause offence, your Head Teacher can arrange for it to be received by the School and passed to the Governing Body, to be used for fundraising.

For these purposes, 'Gifts' and their value limits **do not** include tickets to events. These are considered to be Entertainment as described in 1a) above.

Where items are returned it is good practice to make a proper record of the date and method of return.

2) Record the item within the School's Hospitality Register

The Code requires that the School keep records of all gifts*, hospitality and entertainment offered - **whether accepted or refused** - in a Register and that staff are required to make themselves aware of who is responsible for maintaining the Register. Staff must report all offers of gifts, hospitality or entertainment made to them so that they can be included on the Register.

In order to record the item within the register, staff should complete the 'Record of Gifts, Hospitality & Entertainment Offered and/or Received' [pro-forma](#) (or record all the required information in an e-mail) and submit this to the officer responsible for the School's Hospitality Register.

All of the required information must be provided, including the business reason for any acceptance. The business outcome achieved must also be recorded, but this can only be done retrospectively. After approval by your Head Teacher this form can be submitted electronically or in paper copy to the person maintaining the register. This should be submitted in advance if possible and if not, within one week of the offer being made.

Where multiple offers of gifts, hospitality or entertainment are made, these should all be recorded. The record should clearly identify each separate offer and the dates of these offers.

** As previous stated, very small gifts with a value of less than £1 do not need to be recorded on the School's gift/hospitality register.*

3) Obtain the relevant approval

Before anything is accepted it must be appropriately approved. In most instances approval by your Head Teacher is acceptable; however, in certain instances express approval from the Chair of Governors is necessary, e.g. where the staff member in receipt of an offer of entertainment is a member of

the Senior Leadership Team. The Chair of Governors should consult the relevant committee of the Governing Body before accepting any entertainment for him/herself.

Please Note - Where gifts and hospitality are returned or refused staff are still required to enter the relevant details in the Register even though approval has not been necessary.

Other issues

i) Maintenance of the Hospitality Register

A designated officer of the school will maintain the Hospitality Register for your School. In order to ensure compliance with the data protection regulations and to protect the identities of officers making declarations the Register is required to be securely held.

ii) Review of the Register – The Gifts and Hospitality Register must be reviewed by the relevant committee of the Governing Body, at least every term. This review should be evidenced by a signature and should be dated. The Register will be available for inspection by auditors and authorised officers of the local authority.

iii) Whistle Blowing Policy – Where staff are aware of instances where gifts, hospitality or entertainment have been accepted, which they feel should not have been, or do not think have been, appropriately declared, they have a responsibility to notify these concerns via their own manager or using the School's Whistle Blowing Policy.

iv) Failure to follow the guidance set out above may result in action being taken under the School's Disciplinary Code.

Appendix 4 – Record of Gifts etc Pro forma

**CODE OF CONDUCT FOR SCHOOL STAFF
RECORD OF GIFTS, HOSPITALITY & ENTERTAINMENT
OFFERED AND/OR RECEIVED**

..... SCHOOL

Name of Officer.....

Job Title:

Name of Business/Person Offering Gift/Hospitality/Entertainment:
.....

Gift / Hospitality offered	
Reason for the offer where known	
Offered by	
Offered to (Employee name, job title)	
Date of offer	
Was the Gift / Hospitality accepted or refused?	
Business reason for acceptance	
Business outcome achieved (this will need to be provided afterwards)	
Estimated value (£)	
Reason for refusal	

Officer's signature: Date

Signature of Head Teacher / Chair of Governors:
.....

All School employees are required to complete the following declaration that they have read and understood the code of conduct, including appendices.

Declaration

I acknowledge receipt of the School's Code of Conduct, including the appendices which relate to Standards of Behaviour and Acceptable Standards of Appearance.

I have read all three documents and understand:

- the behaviour expected of me whilst I work for the School
- the action I should take if I become aware or suspect any breach by another worker
- that any breach by me could lead to disciplinary action being taken against me, which could result in me being dismissed from my employment.

Print name:

Signature:

Employee number:

Date:

Please return to:

School Office

This document will be retained on your personal file.

Appendix 5

- **The Nolan Principles**
-
- The Seven Principles of Public Life, known as the Nolan Principles, were defined by the [Committee for Standards in Public Life](#) . They are:
 - **Selflessness** - Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
 - **Integrity** - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
 - **Objectivity** - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.
 - **Accountability** - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
 - **Openness** - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands it.
 - **Honesty** - Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
 - **Leadership** - Holders of public office should promote and support these principles by leadership and example.

ADDITIONAL INFORMATION 3 – Safeguarding Policy 2020

Covid-19 annex to safeguarding policy

This annex should be read in conjunction with the school's safeguarding policy and other relevant policies and procedures

During the Covid-19 pandemic safeguarding children continues to be a priority.

Unless stated otherwise all existing policies, procedures and guidance continue to apply.

1) Concerned about the safety or welfare of a child

- a) Speak to your designated safeguarding lead as per the safeguarding policy
- b) SPOC are continuing to operate, with SPOC Professional Consultation via email childreferrals@croydon.gov.uk.

For urgent child protection matters requiring immediate attention:

Tel: 0208 255 2888

- c) If you believe that a child is at immediate risk of harm call the police on 999

2) Allegations against a teacher, other staff member, volunteer or another professional

- a) Follow procedures as per the school safeguarding policy
- b) The LADO function is operating as normal

3) Designated safeguarding leads

- a) We endeavour to ensure that a DSL or Deputy DSL is available on site
- b) In the event that the DSL and all Deputy DSLs are unable to be present on site on call alternative arrangements will be put in place
- c) We have advised all staff of any on-call arrangements.
- d) When on-call, the DSL and a Deputy DSL can be contacted as follows:
 - o Karen Williams DSL on 0773 – 328 - 4308
 - o Lorraine Slee on 0748 – 750 - 8298
- e) The DSL will inform all staff of any changes to the safeguarding policy

4) Vulnerable children

- a) We recognise that all pupils are potentially vulnerable during this period, though some pupils are already known to be more vulnerable than others.
- b) The school takes steps to ensure all children are safeguarded during this period.
- c) Children are prioritised in relation to risk, with actions proportionate to risk.
- d) We will make the following arrangements:

Priority	Arrangements to safeguard
----------	---------------------------

- | | |
|--|--|
| 1) Without continued regular contact this child will be at significant risk of harm. | Offer the child a full time place in school. |
| 2) Active contact needs to be maintained with this family on a regular/weekly basis to monitor how the family are coping and to escalate if necessary. | Family will be called by both the class teacher and a DSL during the week. |
| 3) Less frequent contact can be maintained due to stability in this child's safety network | Family will receive a weekly phone call from the class teacher. |

- e) A record is kept of all contacts made by recording on CPOMs
- f) CPOMS records are monitored by the DSL and Deputy DSLs
- g) Any concerns about the welfare or safety of a child is recorded and reported to the DSL as normal as set out in the school's safeguarding policy

5) Attendance

- a) The school maintains a daily register of all staff, volunteers and children attending the school.
 - b) The numbers in attendance are reported daily to the Department of Education and Croydon Council in line with required reporting requirements.
 - o For Croydon Council this should be sent to educationenquiries@croydon.gov.uk by midday every day.
- 6) Online lessons/activities and other staff contact with pupils
- a) The schools Code of Conduct in relation to use of technology; staff/pupil relationships and communication; and use of social media still applies.
 - b) The safeguarding of staff and children remains paramount.
 - c) The head teacher may grant permission in advance in specific circumstances such as allowing staff to deliver live online lessons/activities or carry out welfare checks.
 - d) These should be part of an agreed Covid-19 learning and safeguarding plan.
 - e) In devising the plan staff must not be required to:
 - o Contact children on the child's mobile phone. Telephone welfare checks must be made via the parents/carers contact numbers.
 - o Email pupils from their personal email address or email pupils at their personal email address. Any emails between staff and children must be from/to email addresses within the school's email system.
 - o Deliver online lessons/activities on a one-to-one basis. These must be delivered from school accounts/platforms

and there must always be at least two members of staff online for the duration of all such lessons/activities.

- 7) Safer recruitment
 - a) Safer recruitment checks will continue for new staff and volunteers as before in line with the school safer recruitment policy
 - b) All new staff and volunteers must undertake safeguarding training

- 8) Contextual safeguarding information
 - a) The designated safeguarding lead for the school will ensure:
 - All staff and volunteers are aware of the increased contextual safeguarding risks associated with Covid-19 in respect of online safety, mental health and domestic abuse.
 - Parents/carers and children are given appropriate information in relation to the increased contextual safeguarding risks associated with Covid-19 in respect of online safety, mental health and domestic abuse.