



7a Safeguarding Policy



Author: Andrew Wilkes
Last review: 11th October 2021
Next review: As required
Approved by: Robert Gullifer

This policy covers all children in the UCS Foundation – University College School Senior School, University College School Junior Branch, and The Pre Prep – including all pupils in EYFS.

This policy has been received and accepted by Mr Robert Gullifer, the member of the Council of UCS (governing body) with responsibility for Safeguarding.

The Policy is subject to review whenever there are changes in Government Policy or in guidance laid down by the DfE.

The policy was reviewed in September 2021 by the School Council, which will also consider the efficiency with which related duties have been carried out and make any recommendations for changes in practice.

Throughout the policy we refer to the title LADO, which is consistent with the London Borough of Camden who retain the term in their safeguarding policy.

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KEY CONTACTS

UCS Senior School

Frognaal
Hampstead
London
NW3 6XH

Head Teacher: Mr Mark Beard

Contact details: 0207 435 2215

Designated Safeguarding Lead: Mr Andrew Wilkes (Deputy Head, Pastoral)

Contact details: 0207 433 2196 or 07833 233 697; andrew.wilkes@ucs.org.uk

Deputy Designated Safeguarding Leads: Mr Adrian Barnish (Head of Lower School), Mr Stewart FitzGerald (Head of Middle School) and Ms Barbara Calnan (Senior School Nurse)

Contact details: 0207 435 2215; adrian.barnish@ucs.org.uk ,
stewart.fitzgerald@ucs.org.uk and barbara.calnan@ucs.org.uk

UCS Junior Branch

11 Holly Hill
Hampstead
London
NW3 6QN

Head Teacher: Mr Lewis Hayward

Contact details: 0207 435 3068

Designated Safeguarding Lead: Mr Dominic Edwards (Deputy Head, Pastoral)

Contact details: 0207 435 3068; dominic.edwards@ucs.org.uk

Deputy Designated Safeguarding Lead: Mrs Amy Waterhouse

Contact details: 0207 435 3068; amy.waterhouse@ucs.org.uk

UCS Pre-Prep

36 College Crescent
Hampstead
London
NW3 5LF

Head Teacher: Dr Zoe Dunn

Contact details: 0207 722 4433; Email: zoe.dunn@ucs.org.uk

Designated Safeguarding lead: Dr Zoe Dunn (Headmistress)

Deputy Designated Safeguarding Lead: Ms Sophie Ryan Contact details: 0207 722 4433;
sophie.ryan@ucs.org.uk

Designated Safeguarding Lead, EYFS: Miss Nik Watt (Deputy Headmistress)

Contact details: 0207 722 4433; nik.watt@ucs.org.uk

Designated LAC teacher for the UCS Foundation: Dr Zoe Dunn

Contact details: 0207 722 4433; email: zoe.dunn@ucs.org.uk

Nominated Safeguarding Governor: Mr Robert Gullifer

Contact details: nrg@newcollegeschool.org

London Borough of Camden

Child Protection Lead Officer and Local Authority Designated Officer (LADO):

Name: Sophie Kershaw

Deputy LADO: John Lawrence-Jones

Contact details: 020 7974 4556

Safeguarding Lead Officers:

Name: Michelle O'Regan (Head of Service – Children in Need)

Contact details: 020 7974 1905

Name: Tracey Murphy (Service manager)

Tel: 020 7974 4103

Name: Patricia Williams (Service manager)

Tel: 020 7974 1558

Children's Contact Service/MASH team:

Manager: Jade Green

Tel: 020 7974 1553/3317

Fax: 020 7974 3310

Online safety contact officer:

Name: Jenni Spencer

Tel: 020 7974 2866

Early Help/CAF team:

Name: Emma Haigh

Tel: 020 7974 8832/8791

Prevent Education Officer

Name: Jane Murphy

Tel: 020 7974 1008

Reporting of FGM

The police contact number is 101.

If it is thought that a girl is about to be taken somewhere immediately for the purposes of carrying out FGM, including abroad, professionals should call 999. Reporting suspected cases of FGM, or where a girl is thought to be at risk of FGM under general safeguarding rules, professionals should make a referral to the MASH team on 0207 974 3317.

CHILD PROTECTION DEFINITIONS AND INDICATORS

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse. Under the Children Act 1989, CSSW have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

Neglect: failure to provide basic care to meet the child’s physical needs, such as not providing adequate food, clothing or shelter; failure to protect the child from harm or ensure access to medical care and treatment.

Physical abuse: causing physical harm or injury to a child.

Sexual abuse: involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

Emotional abuse: failure to provide love and warmth that affects the child’s emotional development; psychological ill treatment of a child through bullying, intimidation or threats.

Possible indicators of abuse and neglect

<p>Neglect</p>	<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
<p>Physical abuse</p>	<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 injuries or accidents • High frequency of injuries • Parents seem unconcerned or fail to seek adequate medical treatment
<p>Sexual abuse</p>	<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

	<ul style="list-style-type: none"> • 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

SECTION 1 – PURPOSE OF POLICY

This policy sets out how the UCS Foundation 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. UCS will achieve this by providing a safe learning environment and ensuring all school staff have the skills and knowledge to take action where children need extra support from early years services or require a social work service because they are in need or need to be protected from harm.

UCS takes a holistic approach to safeguarding, and children's safety and welfare will be the key focus when developing policies so that the school environment and culture is one where:

- pupils know how to raise concerns, feel safe to raise concerns and are confident that their concerns will be taken seriously;
- staff are equipped to deal sensitively and effectively with concerns and disclosures;
- inclusive and anti-discriminatory behaviour is an expectation for staff and pupils;
- all forms of bullying, harassment and discrimination, or inappropriate, sexualised or offensive language and behaviour are not tolerated;
- the wishes and feelings of pupils are taken into account at all times.

The following policies make up the school's safeguarding and child protection responses and contribute to a safe learning environment:

- Safer recruitment and staff conduct policy
- CSCP guidance on dealing with allegations against staff and volunteers
- Online safety policy
- social media policy
- Peer on peer abuse protocol
- Harmful sexual behaviour protocol

SECTION 2 – ROLES AND RESPONSIBILITIES

2.1 Camden Supporting People Directorate

The Directorate includes Children's Safeguarding and Social Work [CSSW], Early intervention and Prevention and Education divisions and Camden Learning and these services will support UCS to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough
- providing the school with advice, support and guidance, policy and procedures, training and dedicated lead officers with responsibility for child protection and

safeguarding

- dealing with allegations against members of staff and volunteers through the LADO
- taking responsibility for those children who are missing from or not in education, including children who are known to be home educated

2.2 Council (Governing Body of UCS)

Council will ensure that the school meets its statutory duties with regard to safeguarding and protecting pupils and that processes are in place to enable staff to understand the nature of safeguarding children in education and their role and responsibilities in doing so. In particular, the governing body will ensure the following:

- The school has the following policies in place and that these are regularly monitored, reviewed and updated where necessary;
 - safeguarding and child protection policies and procedures covering early help, online safety, extra-familial harm and peer on peer abuse that are consistent with Camden Safeguarding Children Board procedures and Camden's internal policies
 - a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
 - a behaviour policy that includes measures for bullying and harassment, including prejudice based and discriminatory bullying
 - 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.
- There is a nominated governor with responsibility for liaising with Camden on safeguarding and child protection matters and who links 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 school/college's safeguarding and child protection policies and procedures.
- Governors take steps to 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 1 member of the governing body has undertaken accredited safer recruitment training.
- All staff and governors receive safeguarding and child protection training at least every 2 years and receive regular updates from the DSL 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 Head Teacher/Senior Leadership Team

The Head Teacher and/or Senior Leadership Team will ensure that:

- All staff and governors are aware of their role and responsibilities for safeguarding under Part 1 of the guidance *Keeping children safe in education (2021)*.
- Staff are inducted thoroughly in line with section 5.1 of the *Safer recruitment and staff conduct policy for schools and colleges*.
- 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 safeguarding and child protection concerns and can make appropriate referrals to CSSW.
- 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.
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff in line with the policy *Safer recruitment and staff conduct policy for schools and colleges*.
- 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 DSL and his 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 Foundation DSL is available on 07833233697 and on 020 7433 2196 during school hours.

The school will ensure that a senior member of staff is appointed to the role of DSL to take lead responsibility for child protection issues, and that another member of staff is appointed to deputise in their absence. The Foundation's DSLs will undergo training

every two years as well as attending relevant conferences and refresher courses.

The DSL role [and the Deputies] is to:

- refer cases on appropriately to relevant agencies such as Early Help, the CSSW, the LADO, the Channel Panel, the Police and the DBS;
- keep the head teacher, senior leadership team and Council informed of on-going safeguarding and child protection issues and enquiries
- provide support, advice and guidance for staff on child protection issues and making referrals and support them through the referral process;
- take the lead in developing, monitoring and reviewing annually the school child protection policy and procedures, keeping abreast of new policy developments and ensuring that the policy is both known and used appropriately, ensuring that Council is fully aware at all times;
- attend regular training, including Prevent awareness training, and the designated teacher meetings hosted by Camden in order to keep up to date with new policy and working practice;
- have an awareness of those children who may be more vulnerable to poor educational outcomes due to safeguarding and other issues such as children in need, children with child protection plans, children with mental health issues, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs;
- liaise with the school's Director of Wellbeing or CAMHS team as appropriate where there safeguarding concerns are linked to mental health issues;
- raise awareness with staff on how children's vulnerabilities and exposure to safeguarding issues such as neglect, abuse and trauma can negatively influence their educational attainment and behaviour and how staff can work to meet these challenges and improve outcomes;
- oversee child protection systems within the school, including management of records, ensuring confidentiality, provision of information to other agencies and the monitoring of pupils who are subject to child protection procedures;
- link with and report to the Head Teacher and Council regarding child protection issues within the school, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- provide regular updates received from Camden on any changes in safeguarding or child protection legislation, ensuring also that staff are aware of training

opportunities provided by the LSCB;

- provide a link between the school and other agencies, attending child protection case conferences and contributing effectively when doing so;
- ensure staff, including temporary staff and volunteers, have access to and are aware of the school policies and procedures and that appropriate training is taken up at regular intervals – currently every two years, including online safety training, to identify the early signs of peer-on-peer abuse including sexual abuse;
- ensure parents are fully aware of the school's policies and procedures and that they are kept informed and involved;
- encourage a culture where children are listened to, their views taken into account and where they are encouraged to participate in keeping themselves safe;
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools to enable continued support of the child on transfer. This is done separately and securely with confirmation of receipt;

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's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary in cases of suspected abuse and neglect, by making relevant school policies available on the school website 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.

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.

As a relevant agency under the new Camden Safeguarding Children Partnership [CSCP] safeguarding arrangements the school recognises its vital role in safeguarding school-age children and its statutory duty to co-operate with the CSCP to ensure joint working with partner agencies in order to improve outcomes for children.

Council and the senior leadership team across the Foundation will ensure these safeguarding arrangements are followed and that the entire Foundation is able to raise any safeguarding issues and emerging trends with the CSCP.

Full details of the arrangements can be found at: https://cscp.org.uk/wp-content/uploads/2019/06/Camden-Safeguarding-Children-Partnership-Arrangements_Final_June_-2019.pdf

2.7 Contacting the Police

In the event that a criminal offence takes place on the school premises or police assistance is needed to deal with incidents, the school will follow the guidance set out in the NSPCC guidance *When to call the police*

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

2.8 Operation Encompass

The school will ensure that we receive all police notifications of children who have been involved in domestic abuse incidents via Operation Encompass.

The DSL will inform relevant staff of any notification and agree what support (if any) the pupil should receive from the school.

Operation Encompass is a national initiative that helps to safeguard children and young people who may have been exposed to domestic abuse. In practice, this means that if the police are called to a domestic abuse incident and a child has been present when this happened, then the police will notify the child's school DSL. This will be done as early as possible in the morning and allow the school to silently support the child. This allows for rapid provision of support within the school environment and means that children are better safeguarded against the effects of domestic abuse.

School should share details of the notification with as few staff members as possible in order to keep the information confidential, and school will need to decide on the most appropriate staff

member to be informed; this may be the class teacher at the JB or the form tutor, Warden or Head of Section at the Senior School.

If schools in Camden wish to sign up to Operation Encompass, please contact:

Elisabeth Mavin PC 1351CN

Islington Multi Agency Safeguarding Hub

222 Upper Street London N1 1XR

External: 0207 527 6166

Elisabeth.C.Y.Mavin@met.police.uk

MASH mailbox: NI-PublicProtectionDesk@met.pnn.police.uk

Please note that there is no need for schools to make a referral to CSSW following a notification as the police will have already referred the case to the MASH.

SECTION 3 – SAFEGUARDING CHILDREN

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
- undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.

The school will refer to Camden’s thresholds and eligibility criteria (available at the link below) 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.

[Safeguarding children - Camden Council](#)

All referrals for a children’s social care service will be made by way of an e-CAF referral to Camden’s Child and Family Contact team. The team is Camden’s “front door” for children’s social care referrals and accepts referrals for all cases.

Parental consent for referral will be sought but a referral will be made regardless of consent being given in cases where there are safeguarding concerns about the child and making a referral is a proportionate response to those concerns.

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.

3.1 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
- children with mental health needs
- young carers
- children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime or county lines;
- 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;
 - children at risk of radicalisation;
 - children at risk from honour based abuse ie: FGM, forced marriage
 - privately fostered children
 - children who are persistently absent from school including for part of the school day.
- Where the child's extra needs require services, consideration will be given to what early help support can be offered a child by the school.
 - If the child requires an early help service from another agency, the school will make a referral to the Early Help service (via the Child and Family Contact team) 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 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.

3.2 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 DSL or their deputy are most likely to have the most complete safeguarding overview. Following consultation the DSL should decide on whether to make a referral to CSSW via the Contact Service.

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

The Contact Service will inform the school within 1 working day of the outcome of any referral and what action CSSW 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 services for the child and their family in the meantime whilst work is on-going (including details of services).

SECTION 4 – CHILD PROTECTION

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.

“Keeping Children Safe in Education” (DfE September 2021)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999348/Keeping_children_safe_in_education_2021.pdf

“Working together to safeguard children” (DfE 2018)

“What to do if you’re worried a child is being abused” (DfE 2015)

The Safer Recruitment Consortium’s ‘Guidance for safer working practice for those working with children and young people in education settings’ (October 2015).

The London Safeguarding Children Board child protection procedures

<http://www.londonscb.gov.uk/procedures/>

Camden Safeguarding Children Board guidance on:

Missing children

Trafficked children

Child sexual exploitation

Working with neglectful parents

Working with parents affected by substance misuse

Protocol on working with children who harm other children (see section 4.4)

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

- identifying where there are child protection concerns and referring the pupil on to CSSW;
- contributing to the development and monitoring of child protection plans as a member of the core group;
- attend child protection case conferences in order to effectively share information about risk and harm;
- 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 Child protection procedures

The following procedures set out what actions the school will take where there are child protection concerns regarding a pupil.

4.2.1 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 DSL. Where necessary advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.

Staff should refer to the key information on abuse at the beginning of this policy for a full definition of significant harm and the specific indicators that may suggest a pupil may be at risk of suffering harm.

Safeguarding is the responsibility of all staff, and any member of staff or volunteer may make a referral to children's social care.

4.2.2 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 CSSW;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- not ask direct or leading 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 and pass this on to the DSL.

4.2.3 Referral

Where possible a decision on whether or not to refer a pupil to CSSW should be made by the DSL or one of their deputies 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 SMT and take advice from the Child and Family Contact team social worker. The DSL should be informed as soon as possible.

The DSL or their deputy will immediately seek advice from children's social care following a discussion with the member of staff who has raised concerns. If at any time there is a risk of immediate serious harm to a child, a referral will be made immediately to children's social care.

Referrals should be in writing using an e-CAF referral completed either by the teacher raising concerns or by the DSL. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the e-CAF referral within 48 hours.

Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated teacher may discuss the case on a "no names" basis with the Child and Family Contact team to obtain advice on how to proceed.

Parental consent should be sought prior to the referral being made but a referral can be made if parents refuse consent where there are safeguarding concerns about the child and referral is a proportionate response to these concerns. Consent should not be sought if this would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay.

If the child already has an allocated CSSW social worker, the referral should be made directly to them. If the child is not already known to CSSW, referrals should be made to the Child and Family Contact team. If the child lives outside Camden, a referral should be made to their home local authority.

All referrals to Camden Social Care will be acknowledged by the Child and Family Contact team manager within 24 hours and the referrer informed of what action will be taken.

If school does not think that the child's situation is improving within a reasonable timescale following referral, this should be taken up with CSSW/Early help services via the DSL.

4.2.4 Attendance at case conferences and core groups

The DSL will liaise with CSSW to ensure that all relevant information held by the school is provided to CSSW during the course of any child protection investigation.

The DSL 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 Form Tutor or Warden will be nominated to attend. Failing that, the DSL or their deputy will attend. If no-one from the school can attend, the DSL will ensure that a report is made available to the conference or meeting.

4.2.5 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;

- Pupil attendance is monitored according to the school's Attendance Policy;
- monitoring will be carried out by the relevant staff member in conjunction with the DSL;
- all information will be recorded on the child protection monitoring/incident form shown at appendix 1 prior to each conference and core group meeting;
- the completed monitoring form will be kept on the pupil's file and copies made available to all conferences and core group meetings;
- the DSL will notify CSSW if the child is removed from the school roll, excluded for any period of time or goes missing.

4.2.6 Records

Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the Head Teacher's secretary's office.

The DSL will ensure that all welfare records have a basic information sheet (see appendix 2) attached and that this information is kept up to date.

The DSL is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.

All information should be recorded on the safeguarding monitoring/incident form (see appendix 1) and all records should be signed and dated.

Records should show:

- what the concerns were;
- 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.

The monitoring/incident form must be completed (See Appendix 1)

- 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.

Child protection files must be accessed and information shared by members of staff on a “need to know” basis only.

Where a child who is subject to a protection plan transfers to another school, the DSL is responsible for ensuring that copies of all relevant records are passed to the DSL at the new school within 5 days.

The DSL may also consider contacting the new school to share relevant information in order to ensure the child receives the support they need as soon as they transfer

For children transferring to the school from other schools, a written request will be sent for records to be forwarded securely to the DSL. Child protection records will only be kept until the pupil leaves the school and should be disposed of as confidential waste.

4.3 Confidentiality and information sharing

All information obtained by school staff about a pupil and their family is confidential and can only be shared with other professionals and agencies with the family’s consent unless there are safeguarding concerns that need to be shared with CSSW and parents refuse consent or seeking consent would place the child at further risk.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and over are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act; otherwise consent should be sought from parents.

Where a child is at risk of suffering harm, schools have a legal duty to share this information with CSSW 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 CSSW.

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, the school will 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 need not be sought 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 Child and Family Contact team social worker 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's duty to share information. Staff should discuss any concerns around confidentiality or information sharing with the DSL or seek advice from the Child and Family Contact team social worker.

SECTION 5 – STAFF PRACTICE AND CONDUCT

5.1 Induction and Training

The Head Teacher will ensure that all staff are fully inducted, are made aware of the school safeguarding policy and procedures along with the Behaviour and Discipline policy, staff code of conduct and the children missing from education policy and that staff are fully aware of their role in implementing these. Induction training will also include training on the school's Whistleblowing Policy.

The DSL will ensure that the Head Teacher, all staff and volunteers are fully inducted with regard to the school child protection procedures and that they receive safeguarding and child protection training on a regular basis in line with LSCP guidelines – currently every two years. The content of the training has been agreed with the LSCP. Staff induction training will include safeguarding procedures, the school's Safeguarding Policy, the identity and function of the designated teachers, the code of Conduct for Staff and communication of part 1 of Keeping Children Safe in Education. Annex A will also be provided to leaders and those who work with children as part of induction. Signed copies will be kept by HR.

The Head Teacher will keep a central record of all statutory and other training undertaken by staff members, members of the School Council and volunteers.

School staff will receive multi-agency safeguarding training at the relevant level.

Training for staff that regularly work with children, young people and families should enable them to:

- develop knowledge, skills and the ability to work together on the processes for safeguarding and promoting the welfare of children, including those suffering or at risk of suffering significant harm;

- describe inter-agency roles and responsibilities for safeguarding children;
- understand what will happen once they have informed someone about those concerns;
- make a full contribution to the process of child protection and have an understanding of the purpose of inter-agency activities and the decisions required at each stage of the child protection process;
- demonstrate skills in effective collaboration between agencies to achieve intended outcomes for the child and their family.

As well as basic safeguarding training, the DSL and Deputies will receive specific training on their role and other relevant multi-agency training courses every two years. All other staff will receive regular and timely updates on child protection and safeguarding issues via the DSL.

5.2 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. This is reinforced in the Foundation Staff Code of Conduct that is issued to all staff and to the governing body.

Each member of staff will be provided with Part 1 and Annex B of the DfE document *“Keeping Children Safe in Education”* (DfE, September 2021)

An acknowledgement that this has been read must be sent to and will be retained by the HR Department.

The Head Teacher will ensure that each member of staff, including volunteers, is provided with a code of conduct agreement on appointment that sets out the school’s expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.

Staff will be expected to follow the model social media policy for schools in terms of their use of social media, particularly in relation to professional standards and relationships with pupils. All staff and volunteers will sign an acceptable use agreement before being given access to the school computer system.

5.3 Providing intimate or personal care to pupils

When intimate or personal care is necessary i.e. changing underwear because a child has soiled him/herself, staff follow these steps:

When taking children to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen.

Parents/carers should always be notified when intimate care has been provided.

When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated teacher and/or Head of EYFS as applicable.

- Staff should strongly encourage children to take ownership of removing their clothes and cleaning themselves.
- Staff should ensure that children's privacy is of paramount importance and that providing intimate care is done in a separate area.
- When changing, levels of supervision should be appropriate to the child's age.

5.4 Teachers working one-to-one with pupils

In certain situations in specialist performing arts and sports teaching, staff may work with individual children. All staff are reminded about the need to maintain a professional distance at all times. Pupils should always be in a position where they can leave an individual lesson if they feel in any way uncomfortable. If the teaching involves touching a pupil – for example to place their hands in a particular way on a musical instrument – staff are advised to tell the pupil in advance what they are going to do and for what purpose. In the event. Members of staff should be aware of the limits within which such contact should take place and of the possibility of such contact being misinterpreted. If a situation arises where it is felt by the teacher that either physical contact or the use of language has been misinterpreted by a pupil, this should be reported immediately to the Head of Department or Line Manager who will request a written summary of what has occurred.

5.4.1 Music tuition

It is recognised that music teachers are vulnerable to allegations being made against them because they often work with children alone and the activity can involve some physical contact with a child.

Music teachers need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:

- *ensure they behave in an appropriate manner and maintain professional boundaries at all times*
- *only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed*
- *make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why*
- *ask the child's permission first and respect their wishes*

- *report any incidents or issues that arise to the Director of Music and make sure a record is taken*
- *never travel alone with children in a car*
- *seek permission from parents before contacting children by mobile phone, for instance to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable.*

The school should:

- *carry out a risk assessment around providing music tuition. This should include:*
- *providing rooms/spaces that are adequately safe and open locations where the teacher can be easily observed by others, for example a door with glass in it*
- *passing on any relevant information about children that may have a bearing on how they could react to physical contact so the tutor can adapt their practice accordingly*
- *let parents know when they arrange tuition what level of physical contact may take place as part of the activity*
- *record any reported incidents or issues and deal with these within the framework of our own policies*
- *make sure music tutors are aware of the school's safeguarding and staff conduct policies prior to starting.*

SECTION 6 – MANAGING ALLEGATIONS OF ABUSE MADE AGAINST TEACHERS AND OTHER STAFF AND VOLUNTEERS

Schools have a duty to safeguard pupils and create a safe learning environment by ensuring that only staff who are suitable to work with children are employed, so it is crucial that there is a robust process in place for dealing with any allegations of harm or abuse by a staff member or volunteer against a pupil.

This policy sets out the procedures to be followed by head teachers and governors when dealing with allegations that a member of staff or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child,
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children for example behaviour in their private life that raises concerns (a *transferrable risk*).

As well as covering the four categories of harm and abuse, allegations involving inappropriate relationships with pupils, grooming behaviour on-line, possession of

indecent photographs or images of children and other offences under the Sexual Offences Act 2003 and including activities and behaviour taking place outside school that involve a transferrable risk should also be dealt with under this policy.

The policy applies to all school governors, head teachers and staff members within the school, including permanent and temporary staff, supply teachers and volunteers who are currently working at the school even if the allegation involves an incident that happened at another school. Allegations against staff that have since left the school are not dealt with under this policy and should be referred to the police.

If allegations about a staff member's treatment of their own child are raised, the police or local children's social care department where the staff member lives should notify the Camden LADO who will contact the school and the CAIT to explore whether the information raises questions about the person's suitability to work with children.

Any incidents and allegations arising in a Camden school will be dealt with by the Camden LADO under these procedures even if the pupil lives in another borough. However, if there are concerns about the safety and welfare of other children with whom the staff member is in contact with in other boroughs, the designated safeguarding lead should consider making a referral to children's social care in that borough.

6.1 Legal framework

All schools must have procedures in place to deal adequately with any allegations made against staff and the procedures must comply with the guidance set out in *Working together to safeguard children* and the statutory guidance "Keeping children safe in education".

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Schools are expected to have a two tier system for dealing with concerns and allegations in relation to the behaviour of staff:

- Low level concerns that do not involve harm to a child but raise concerns about the staff member's professional behaviour will be dealt with via internal procedures based on the school's staff conduct policies.
- Concerns and allegations that involve possible harm to a child will be dealt with under this policy. This includes any concerns relating to transferrable risks even where the named child has not been harmed on this occasion.

Camden follows the London Safeguarding Children Board child protection procedures for dealing with allegations against staff (section 7) and schools should be aware of their role under these procedures.

https://www.londoncp.co.uk/alleg_staff.html

Camden follows the London Safeguarding Children Board child protection procedures for dealing with allegations against staff and schools should be aware of their role under these procedures.

6.2 Principles

- The welfare of pupils is paramount; all staff members and volunteers have a duty to take any necessary action to safeguard and promote the pupil's welfare.
- The pupil's welfare must be taken into account throughout the duration of any investigation and appropriate services provided where needed.
- Allegations should be dealt with fairly and quickly and generally resolved within 1-3 months. Only in exceptional circumstances, for example where criminal proceedings are taking place, should allegations take more than 12 months to resolve.
- Allegations should be dealt with by the most efficient method and at an appropriate level, involving agencies such as the police and CSSW only where there is a clear need.
- Parents, pupils and staff should be made aware of this policy so that everyone is clear about how concerns can be raised and what actions are likely to happen when an allegation is made. Pupils should be taught how to protect themselves and who they should approach for help.
- Information should be shared in a timely way but only for the purposes of safeguarding and promoting the welfare of children.
- Those staff members wishing to raise concerns anonymously will be supported through Camden's whistle-blowing procedures.
- All responses should be fair, transparent and balanced and should ensure the safety of children whilst supporting those adults who are the subject of allegations.

6.3 Roles

Every school must have a named person who is responsible for the management of allegations against staff and to whom allegations and concerns should be reported in the first instance. This will normally be the head teacher, a designated governor or the designated safeguarding lead.

Schools should also appoint a deputy to deal with allegations in the named person's absence or in the event that the named person has an allegation made against them. Allegations against head teachers should be referred to the Chair of governors.

Camden has a named Local Authority Designated Officer (LADO) and Deputy LADO whose role is to oversee the management of all cases involving allegations against staff. However, the day to day management of cases is covered on a rota basis by Independent Reviewing Officers (IROs) based in the Quality Assurance Unit so that there is always a senior social work professional available to provide advice and take any necessary action. Throughout this policy, references to the LADO will mean either the LADO or the IRO who has been allocated the case via the rota.

The LADO will provide advice to schools on individual cases, liaise with Children's Safeguarding and Social Work (CSSW) and the Police Child Abuse Investigation Team (CAIT) where required and monitor and review the progress of cases.

Camden's LADO is: Sophie Kershaw Deputy LADO: John Lawrence-Jones Children's Quality Assurance Unit Children's Safeguarding and Social Work 5 Pancras Square London N1(C) 4AG Tel: 020 7974 4556
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Camden Borough Police CAIT will appoint a responsible officer to oversee police responses for managing allegations, liaising with the LADO on individual cases and ensuring police attendance at meetings and monitoring and reviewing the progress of cases.

Camden Borough Police senior officer is: DCI Ralph Coates Police Child Abuse Investigation Team (CAIT) Holborn Police Station 10 Lambs Conduit Street London WC1N 3NR Tel: 0208 345 0124 Mobile: 07920 710321

Email: Ralph.Coates@met.police.uk

6.4 Procedures

6.4.1 Notification

Allegations may arise following a complaint from a parent or pupil or through concerns raised by other staff members. All allegations must be reported to the responsible person within the school immediately.

A written note of the details of the allegation, including times, dates, locations and the nature of the concern must be agreed with the responsible person. Staff should be aware of the general rule that allegations must not be investigated and pupils should not be promised confidentiality.

The responsible person should carry out preliminary enquiries to establish the facts and whether there is any evidential basis to the allegation before making a referral to the LADO.

This should help the responsible person decide whether the incident meets the threshold for referral as set out in section 1 of this guidance or if the matter should be dealt with as a low-level incident under the school's staff conduct policies. Where the responsible person is unclear as to which process to follow, the LADO can be contacted for a "no names" discussion so that advice can be given.

The responsible person should not speak to the staff member at this stage but should only do so once they have established that a LADO referral will not be needed or after taking initial advice from the LADO.

The responsible person must notify the Camden LADO within 1 working day of all allegations made against members of staff. The responsible officer should complete the *LADO Agency reporting form* and email this to the LADO mailbox LADO@camden.gov.uk. The referral form is available at:

<https://cscp.org.uk/professionals/managing-allegations-against-staff-and-volunteers-lado/> The LADO will contact the referrer as soon as possible and to discuss the case and decide what action to take.

However, it is recognised that in some emergency situations, schools may have to take immediate action to protect pupils, and may contact the LADO by telephone to discuss the matter to agree urgent action.

6.4.2 Initial action

Following notification, initial discussions between the school representative and the LADO should look at all the available information about the incident or allegation, the staff member and the child involved (including details of any previous allegations made by the child and their family) and decide if the allegation is serious enough to be dealt with under this policy.

Consideration should also be given to the safety and welfare of other children at the school and the staff member's own children and a decision made about taking any action to safeguard them.

The school representative and the LADO should agree what action to take, which may be:

- referral to the police for a criminal investigation
- referral to CSSW for assessment and possible child protection investigation
- initiation of disciplinary proceedings against the member of staff
- no further action to be taken.

Some cases may not involve harm to pupils and will not require an immediate response from the police or CSSW; in these cases, agreement will be made for the school to deal with the matter under local school policy as a professional standards matter. If following the school's own investigations there are concerns, the school should refer the matter back to the LADO for action to be taken under this policy.

If the case raises serious concerns immediate action will be taken under this policy.

Where action will be taken, the LADO will liaise with the police and CSSW to ensure appropriate referrals are made and that all relevant information is passed on. The LADO and responsible person should also consider:

- if any further information is needed to assist the investigation
- whether any immediate action needs to be taken to protect pupils
- whether parents should be notified of the allegations (although in some cases this will be unavoidable, for example if the child requires medical treatment)
- how the child and their parents will be supported during the process
- whether any regulatory body such as Ofsted needs to be informed of the allegation.

Consideration should also be given to whether the seriousness of the allegations warrants the member of staff being suspended or whether they should continue to have

contact with the child involved or any other pupil. See section 6.2 for further guidance on this.

The member of staff should be informed of the allegation and given as much information as possible, unless there are good reasons for not doing so. In cases where a criminal or child protection investigation is possible, the LADO should seek the advice of the police and CSSW regarding what information can be shared.

The school and the LADO should both make a written note of discussions and decisions should be agreed and the reasons for taking any particular course of action noted. This is particularly important in cases where no further action will be taken.

6.4.3 Allegation against staff and volunteers (ASV) meeting

If the LADO believes that the pupil has suffered or is at risk of suffering significant harm, a referral will be made to CSSW and an ASV meeting convened to share information and agree on further action.

The meeting will be chaired by the LADO and should be attended by the responsible person from the school, a representative from the police CAIT and any other relevant person or agency, for example a representative from the employment agency supplying a temporary staff member.

The ASV meeting will:

- decide whether or not the pupil has or is likely to suffer significant harm and whether to instigate a child protection and/or criminal investigation which may be jointly conducted between the police and CSSW;
- look at what disciplinary processes should be put in place;
- consider the allegation in the light of any previous allegations or concerns and whether the staff member was acting reasonably in line with the school's behaviour policy (see section 6.1);
- make a decision about suspending the staff member where this is a proportionate response (see section 6.2);
- consider what action should be taken to ensure the safety of the pupil involved and all other pupils;

- agree the plan for investigating the allegation and providing support to the staff member and the child whilst the investigation is on-going;
- agree what information should be shared between agencies and how issues relating to media reporting or containing speculation will be dealt with.

The ASV meeting may consider suspending the member of staff but other alternative arrangements to ensure the member of staff has no contact with the child involved should be considered in the first instance before suspending the staff member.

It is a school decision as to whether or not to suspend the staff member and this should be based on a clear risk assessment and be in accordance with the school's own policies on staff conduct.

However, in cases where there are serious allegations and clear evidence of abuse, the police and CSSW may take alternative action if schools do not follow a recommendation to suspend a staff member.

6.4.4 Review ASV meeting

A review ASV meeting should be held within a reasonable timescale in order to review the actions agreed at the initial strategy meeting and agree what further action should be taken.

The review should consider the outcome of any investigations carried out by the police and CSSW and whether there is enough evidence to pursue the allegation further or take action under child protection procedures.

If no further action will be taken by CSSW or the police, the meeting should agree what further steps the school should take to ensure the safety of pupils, for example what further investigation should be carried out by the school or what action to take with regard to the member of staff involved.

6.4.5 Final outcome of investigations

Following the review ASV meeting once investigations are completed and final actions decided the possible outcomes are:

- The allegation is substantiated as there is sufficient evidence to pursue the allegation.
- The allegation is malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- The allegation is false: there is sufficient evidence to disprove the allegation.

- The allegation is unsubstantiated: there is insufficient evidence to **either prove or disprove** the allegation.
- The allegation is unfounded: these will be cases where there is no evidence or proper basis which supports the allegation being made.

6.4.6 Police action and criminal proceedings

The police CAIT should keep the school and the LADO informed of all progress in investigations and proceedings, including any decision to charge or the outcome of trials. These should be discussed with the LADO to decide on any action needed by the school in relation to disciplinary proceedings or decisions on continued employment.

6.4.7 Disciplinary proceedings

Decisions to follow disciplinary proceedings lies with the school but must be considered in all cases where a criminal or child protection investigation has not been considered necessary or on completion of any criminal proceedings. The school representative should discuss any disciplinary proceedings with the LADO and look at what options are available to deal with the matter.

If a further investigation is required, CSSW and Camden Learning will be able to advise schools on how to undertake the investigation and may be able to provide a suitable council officer to carry out the task if necessary.

The school representative should discuss any disciplinary proceedings with the LADO taking into account any information raised by child protection enquiries, criminal proceedings or the outcome of any trial. This discussion should also look at whether a referral should be made to the Disclosure and Barring Service.

If the staff member concerned is an agency worker or volunteer where disciplinary proceedings are not possible, the school and the LADO should work jointly with the employer or individual to resolve the matter.

If formal disciplinary action will not be required, the head teacher should take any appropriate action within 3 working days. Full disciplinary hearings should be held within 15 working days if no further investigation is needed.

If a disciplinary investigation uncovers evidence of significant harm to a child, a referral must be made to CSSW and the disciplinary proceedings suspended until the outcome of any child protection investigation.

6.4.8 Referral to the Disclosure and Barring Service (DBS) and the Teaching Regulation Agency (TRA)

There is a legal duty on employers to refer any individual to the DBS if it is thought that they pose a risk to children or have harmed a child. The DBS will then make a decision as to whether or not to bar the person from working with children in a regulated activity such as teaching.

As cases move towards conclusion and all information is available, the school and the LADO should discuss whether a referral needs to be made to the DBS. A referral must be made if the allegation is proved and the person has been removed from their post or has resigned prior to being removed.

Where the member of staff is a teacher, the strategy discussion should consider whether a referral should be made to the TRA in order to consider a prohibition from teaching. However the final decision on whether or not to make the referral rests with the school.

6.4.9 Monitoring and oversight of cases

The LADO will review all cases involving allegations against staff members on a fortnightly basis where the case is complex or on a monthly basis for more straightforward cases. This is to ensure that cases are dealt with efficiently and within prescribed timescales.

The responsible police officer in CAIT will review all cases in criminal proceedings that involve allegations against staff members and will pass on information to the school and the LADO regarding progress of investigations and prosecutions. Cases must be reviewed within 4 weeks of any decision to refer the matter to the police and then at fortnightly intervals.

Once cases have been resolved, the responsible person should review the events in order to identify any issues and decide whether school procedures or practices need to be updated or improved so that similar incidents can be prevented or responses improved in the future.

6.5 Practice issues

6.5.1 Allegations involving physical contact

Head teachers and governors will be aware that for some teachers, for example music and PE teachers, physical contact with a pupil is unavoidable and necessary in order to teach the subject. Guidance on this is available in the schools safeguarding and child

protection model policy available at: <https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

Further, teachers can use reasonable force in order to control or restrain a pupil in specific circumstances. Schools should refer to Camden's guidance on the use of physical restraint and intervention available at: <https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

These factors must be taken into account at all stages of the process, from initial consideration and strategy discussion. In particular, it must be demonstrated that any contact that has taken place is within the boundaries set out by local safe working practices and agreed procedures for the use of physical restraint.

It is important that staff are provided with and follow school guidance on acceptable behaviour and safe working practice in order to protect them from misplaced or malicious allegations.

6.5.2 Suspension

Suspension should not be an automatic outcome of any allegation but used only where there is no alternative following a risk assessment and having considered other alternative ways of reducing harm.

Schools should consider the effect of suspension on the member of staff and be mindful that suspension will normally only be justified where there is a risk of significant harm to pupils, a police investigation is likely to be carried out or the allegation is so serious it would normally warrant immediate dismissal if proved true.

Even in these cases, schools should first consider other ways of managing risk, such as arranging for the member of staff to have limited contact with pupils or ensuring they are constantly supervised.

Decisions on suspension should be based on a robust risk assessment and discussed with the LADO in the first instance. CSSW and the police will be able to advise schools on possible courses of action to safeguard pupils and may make a recommendation on suspension but the final decision will rest with the school. All decisions on suspension should continue to be reviewed as new information becomes available during investigation.

If suspension is to be used, the member of staff must be given written confirmation of the decision within 1 working day detailing the reasons and giving the name of the person at the school whom the member of staff can contact for support and information.

Any decision to suspend a member of staff should be recorded by the school and the LADO with reasons given and details of what alternative ways of managing risk other than suspension were considered and why they were rejected.

Where an interim prohibition order is in place for teaching staff following an allegation and the TRA are carrying out an investigation, the member of staff must not carry out any teaching duties until the matter is resolved. Schools should put in place policies in relation to pay during this period

6.5.3 Resignations

Full investigations into allegations must proceed even if the person involved resigns as it is important that the matter is properly dealt with and that a resolution or conclusion is reached and appropriate action taken. It is important to decide whether allegations are substantiated and what further action may have to be taken to safeguard children through referral to the Disclosure and Barring Service and the Teaching Regulations Agency even if the staff member involved has left the school.

Schools should not use compromise or settlement agreements that allow a person to resign with a reference in return for not initiating disciplinary proceedings in cases where allegations of abuse of children are involved. As stated above, it is crucial that all allegations are fully investigated and failure to refer to the DBS or TRA when the criteria for doing so are met would be a criminal offence on the part of the school.

6.5.4 Unfounded or malicious allegations

If an allegation is proved to be unfounded or malicious, the LADO may decide to refer the child to CSSW for assessment as a child in need. Malicious allegations made by pupils may also be dealt with under the school's behaviour policies if this is more appropriate.

6.5.5 Return to work

Where a member of staff returns to work following suspension, schools should consider how best to facilitate this and take advice from the LADO. The staff member should be offered support to help them with their return, as should parents and children. Consideration should be given to how to manage contact between the pupil and staff member in the light of the allegation.

6.5.6 Records and references

All allegations made must be recorded on the individual's personnel file, giving details of the nature of the allegation, actions taken and decisions reached. This is the case even where the allegation is unfounded. However, the exception to this is any allegation that is proved to be malicious; all references to these allegations should be removed from the personnel record unless the staff member consents to the record remaining.

Records should contain the following:

- a summary of the allegation
- details of how the allegation was investigated and resolved
- a note of any actions taken and decisions and outcomes reached
- a statement as to whether the information will be included in any reference.

It is important that records show clearly how a resolution to the allegation was reached and that this information is available when references are being written or information sought from future employers. Information should be kept on the personnel file until the person reaches retirement age or for 10 years from the date of the allegation if that is longer.

Allegations that have been found to be false, unsubstantiated, or malicious should not be included in a reference, including any repeated concerns that have been found to be false, unsubstantiated or malicious.

Allegations that have been substantiated should be included in references and should contain only the facts of the case.

Schools can get further advice from the Information Commissioner guidance available at: <https://ico.org.uk/>

6.5.7 Confidentiality and information sharing

Information should be shared between all agencies at the initial discussion and ASV meetings in order to gather as much information as possible to make an informed judgement on what action to take.

At the initial discussion, the school representative and the LADO may wish to discuss what information will be shared with whom, and what action will be taken to manage any possible breaches of confidentiality or press interest.

Consent must be obtained to share information with third parties, for example police statements or child protection investigations being passed on to schools for the purposes of disciplinary proceedings.

It is essential that confidentiality is maintained whilst any investigation is on-going and the Police will not make public any details of criminal investigations unless and until the person involved is charged.

All those involved, including parents and pupils, must be made aware of the statutory reporting restrictions in place to ensure the identity of the staff member and the victim is not made public. This includes posting information about the allegation on social networking sites.

6.6 Support for those involved

6.6.1 Staff

Schools have a duty to support staff members who are being investigated following an allegation in order to minimise stress. Staff should be informed as soon as possible about any allegation made and given all information available, subject to advice from the police and CSSW.

Staff should have a named person available to provide support and information, particularly if they have been suspended, and should be given advice on obtaining legal representation and counselling if needed. They should also be told about the process of any investigation and kept informed of the outcomes and progress of these.

A copy of the CSCP information leaflet “Allegations against staff – what happens next?” should be provided to the member of staff. The leaflet is available at <https://cscp.org.uk/wp-content/uploads/2019/06/Allegations-against-staff-what-happens-next.pdf>

Schools should not insist that suspended staff members of staff have no contact with other staff unless there is good reason to believe such contact may interfere with investigations. This is a matter that schools may wish to discuss with the LADO and the Police CAIT.

Schools should also consider the support needs of any member of staff returning to work following suspension once the investigation has been completed.

6.6.2 Children and parents

The parents of the child should be notified of allegations and given all information available as soon as possible subject to advice from the police and CSSW if there will be an on-going investigation or further action. They should also be kept informed of progress and outcomes of investigations.

Consideration should be given to the impact of the allegation on the child and support put in place. If the child has suffered significant harm or is in need, a referral will be made to CSSW who will assess the child and provide appropriate services and support.

Parents should be informed of any referral to CSSW and their consent sought and should be reminded of the need to maintain confidentiality about the allegation while the matter is under investigation.

6.6.3 Supply teachers

Schools should be aware that supply teachers and others who are not directly employed by the school will still be subject to these procedures and any allegations made against these staff must be investigated in the same way, even if the school decides to end the staff member's contract of employment.

The school should take the lead in referring the matter and investigating the allegation in partnership with the LADO under these procedures but employment agencies and others are expected to co-operate, and should be invited to the strategy discussion to ensure their role is clarified.

Schools should ensure that supply teachers and others are aware of their right to support from a trade union or colleague during the investigation process.

SECTION 7 – SAFEGUARDING VULNERABLE CHILDREN

Some children are living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes. Some may need help or intervention from CSSW or other agencies in order to overcome problems or keep them safe.

UCS 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 or from their peer group.

We should be aware of the following policies so that they are able to respond to the needs of these vulnerable groups.

Children at risk of sexual exploitation

www.cscp.org.uk

Children at risk of "So-called honour-based abuse". Both FGM and Forced Marriage

are examples of Honour-Based abuse.

Children at risk of female genital mutilation (FGM)

The school now has a mandatory duty to report known cases of FGM on girls under the age of 18 to the police. The school will follow the statutory guidance on FGM available at: [Multi-agency statutory guidance on female genital mutilation – Publications – GOV.UK](#)

All concerns around FGM, including any disclosure made by a pupil, will be discussed with the DSL before any action is taken.

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies. FGM causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child. It is practised by families for a variety of complex reasons but often in the belief that it is beneficial for the girl or woman. FGM is practised in 28 African countries as well as in parts of the Middle East and Asia. The practice is illegal in the UK. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM. The girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to "heal" before they return to school. Some girls may have FGM performed in the UK. FGM is child abuse and a form of violence against women and girls.

If staff have a concern that pupil, a member of their family, or a friend is at risk of female genital mutilation, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

In cases where members of staff become aware that an act of FGM has been carried out on a pupil, member of the family or a friend under the age of 18, the school will not carry out investigations, but will report this to the police on the 101 telephone number. Reporting is mandatory. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's designated safeguarding lead and involve children's social care as appropriate.

More detailed advice about practice in such cases may be found in the following documents:

www.cscp.org.uk

<http://www.cscp-new.co.uk/wp-content/uploads/2015/10/FGM-mandatory-reporting-guide.pdf>
and

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

Children at risk of forced marriage:

Forced marriage - Detailed guidance - GOV.UK

In a forced marriage, one or both spouses do not consent to the marriage, but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In an arranged marriage, the families of both prospective spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the couple.

Children who have a social worker

The school recognises that children who are receiving a social work service from CSSW and who are subject to child in need or child protection plans are likely to have experienced abuse, neglect and trauma and that this could have a negative effect on their behaviour and learning.

CSSW social workers will inform schools whenever a child is receiving a service and the DSL will keep a record of all pupils who have an allocated social worker.

The school will work in partnership with social workers to implement the child's plan in order to support their education and safeguard and promote their welfare. A representative of the school who knows the pupil well will become part of the professional network and will share information about safeguarding risks and attend planning meetings. In their absence, a suitable colleague will deputise for the member of staff or a written report will be provided for meetings.

Children who run away/go missing:

http://cscp.org.uk/downloads/policies_guidance/local/CSCB%20Missing%20Children%20protocol%202010.pdf

Schools should also be aware that going missing is an indicator of other issues, such as child sexual exploitation, gang activity and trafficking.

Young people living with domestic or sexual violence:

Schools can refer young people affected by domestic or sexual violence to the specialist worker based in the Camden Safety Net on 020 7974 1864 for advice and support. The government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over, or have been, intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to: psychological, physical, sexual, financial and emotional.

Exposure to such abuse can have a serious and long-lasting impact upon children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Further advice on identifying children who are affected by domestic abuse and how to help them can be found at:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

Young people at risk from gang activity or serious youth violence:

Safeguarding children and young people who may be affected by gang activity - Publications - Inside Government - GOV.UK

Camden has a comprehensive strategy for reducing the risks posed by gang activity, and schools can refer young people to the Young Person's Advocate based in the Youth Offending Service on 020 7974 6174 for advice.

Schools should have an awareness of the indicators of young people at risk of serious violence. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Contextual Safeguarding and extra-familial harm

UCS is aware that as young people grow more independent and spend more time away from home, they may face more risk from safeguarding threats outside of the home. These threats may be from within the community, from other pupils at school/college or from their own peer group rather than from within the family (extra-familial harm).

Whenever staff are made aware of any safeguarding incident or concerning behaviour that has taken place out of the home and that has put a young person at risk, staff will consider this in the context of the young person's peer relationships and the wider environment when assessing the level and nature of the risk and making decisions on referrals.

Young people experience physical, cognitive and emotional changes during adolescence and will grow more independent, spending more time away from home. They may pursue risky behaviours and as a result, they may face heightened risk from safeguarding threats outside of the home. These threats may be from within the community, from other pupils at school or from their own peer group rather than from within the family and there may be no concerns about parenting other than concerns about supervision. Sources of harm and exploitation can include:

- child sexual exploitation
- child criminal exploitation including county lines
- modern slavery and trafficking
- gang activity and youth violence
- radicalisation.

Exploitation is a form of abuse involving an imbalance of power within a relationship that allows one party to use this power to manipulate another to carry out an act. The victim may believe that they are acting on their own accord but in fact their consent has been obtained through deception, duress or force and threats of violence. Factors such as substance misuse and periods of going missing from home or school can also add to young people's vulnerability to extra-familial harm and are often indications that exploitation may be taking place.

Young people at risk from gang activity or serious violence

[Safeguarding children and young people who may be affected by gang activity - Publications - Inside Government - GOV.UK](#)

Children at risk of self-harm

Schools should have awareness of risks and signs of children who self-harm and have clear procedures to provide support.

Modern Slavery and Trafficked children:

The CSCP protocol provides guidance for agencies where it is thought children are victims of modern slavery or have been trafficked into or within the UK including children and young people who are being criminally exploited on the "county lines" model.

Privately fostered children:

Schools have a legal duty to notify Camden of any pupil they know to be privately fostered. Schools should contact the Fostering team on 020 7974 6783 to notify Camden of any private fostering arrangements that come to their notice.

Young carers:

If schools have concerns about a pupil they believe to be a young carer, they can contact

Family Action on 020 7272 6933 for advice and can refer the pupil on for services and support. Further details can be found on the website.

www.family-action.org.uk

Young people at risk of radicalisation and violent extremism:

The school's PSHE Programme is designed to help children make safe choices, deal carefully with risk, resist pressure and know to whom they can turn for help if necessary. Through the teaching of PSHE and Citizenship, the school actively promotes the values of democracy, diversity, and mutual respect and these values are enshrined in the school's Code of Conduct. The PSHE programme aims to build resilience in pupils to the risk of radicalisation. The school's safeguarding duty includes the duty to promote British values in order to counter any extremist narrative and prevent young people from being radicalised and drawn into terrorism. Measures are also taken to ensure that extremist and terrorist material cannot be viewed by pupils accessing the school's internet. The school's internet system contains filters which prevent access to unacceptable material and the Technical Services Manager monitors the use by pupils of certain key words. It is the school's policy to train pupils to stay safe online both inside and outside school. Teaching Staff are also made aware of the risks posed by online activity of extremist and terrorist groups.

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.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

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

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_Guidance_England_Wales.pdf

Where the school 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 will follow the guidance set out in the CSCB guidance "Safeguarding children and young people from radicalisation and extremism" available at: <http://www.cscp-new.co.uk/wp-content/uploads/2016/03/CSCB-guidance-on-radicalisation-and-extremism.pdf>

UCS should always be a safe space for young people to explore new ideas and perspectives, and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered, we should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.

The DSL should be consulted for internal advice. We may also choose to speak to the Police Prevent Engagement Officer [Mark Fowler] Mark.P.Fowler@met.pnn.police.uk or call 0208 733 6014 and Camden's Prevent co-ordinator [Albert Simango] albert.simango@camden.gov.uk or call 020 7974 2010 or the Prevent Education Officer [Jane Murphy] jane.murphy@camden.gov.uk or call 020 7974 1008.

Online-Safety

UCS recognises its duty to provide a safe learning environment and will ensure that pupils are taught how to remain safe online. Please refer to the recent guidance on "sexting and banter" and peer on peer abuse.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG_NCA_Sexting_in_Schools_WEB_1_.PDF

Children who harm other children (peer on peer abuse)

UCS will ensure that all staff are aware of peer on peer abuse and know what action to take when a pupil's behaviour is likely to cause harm to other pupils. This may be through:

Bullying and cyberbullying, physical violence, sexual violence and sexual harassment, upskirting, sexting or initiation rites [hazing]

All incidents of peer on peer abuse will be dealt with under the *Peer on peer and sexual violence and harassment guidance for schools and colleges* available at: <https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

Harmful sexual behaviour, sexual violence and harassment

UCS recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated.

Our behaviour management and anti-bullying policies will reflect our approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

UCS will follow the statutory guidance *Sexual violence and sexual harassment between pupils* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

All incidents involving sexual violence or sexual harassment between pupils will be dealt with under the *Peer on peer and sexual violence and harassment guidance for schools and colleges* guidance and the *Harmful sexual behaviour* protocol.

<https://cscp.org.uk/resources/sexual-harmful-behaviours/>

Upskirting is a form of sexual harassment that normally involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks. It often occurs in a public crowded place, making it hard for the victim to know that a photograph is being taken. Upskirting is a criminal offence under the Voyeurism Act 2019.

UCS will take all necessary steps to put in place a preventative programme via the PHSE curriculum in order to convey our policy and promote respectful behaviour between pupils with regards to sexual conduct.

We will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school and appropriate referrals made to the police and CSSW.

We will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff.

We will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

Procedures

UCS will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the KCSIE 2021 statutory guidance.

Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the DSL. The DSL is responsible and should be made aware of any online safety concerns. They will carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the school environment.

Where the allegation involves material posted online, the school will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance *Searching, screening and confiscation advice for schools*.

The member of staff and DSL will write up a record of the investigation that will set out how the school will respond to the incident.

Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the CSCP *Harmful sexual behaviour protocol*. The DSL may take advice from MASH social workers before making a decision. Possible outcomes include referral to Early Help Services, CSSW or the police, or managing the matter internally under school behaviour policies.

Where a referral will be made to CSSW or the police under the protocol, the DSL will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.

We will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and CSSW investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.

Where necessary and appropriate, the school will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf under the *Harmful sexual behaviour* protocol.

Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003, including rape, assault by penetration or sexual assault without the consent of the victim.

Sexual harassment is defined as unwanted sexual conduct likely to violate the victim's dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.

Children at risk of sexual exploitation

<https://cscp.org.uk/wp-content/uploads/2019/06/CSCB-multi-agency-guidance-on-child-sexual-exploitation.pdf>

County lines and criminal exploitation

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

Criminal exploitation occurs where a person or a group of people takes advantage of their contact with and influence over a young person to coerce or manipulate them into carrying out a criminal act. Examples of criminal exploitation are:

- county lines
- benefit fraud
- forced theft
- forced begging
- cannabis cultivation
- money mule (where the young person's bank account is used by others for money laundering).

County lines is the most common form of criminal exploitation in Camden and describes when gangs and organised crime groups exploit young people to transport and sell drugs, sometimes across county boundaries but also locally and within the borough. The young people have dedicated mobile phone 'lines' for taking orders for drugs and are used as they are less likely to be stopped by police, allowing adult dealers to avoid the risk of arrest.

Indicators include unexplained money, having several mobile phones, frequent calls, being in trouble with the police for possession of drugs, being found in an area to which they have no connection.

Children and young people experiencing mental health issues

The school recognises that some pupils may experience mental health issues that can negatively affect their behaviour and their ability to participate fully in education.

The school is party to the multi-agency protocol on children and young people's mental health and will carry out its responsibilities under that protocol where there are concerns about a pupil's mental and emotional wellbeing.

<https://cscp.org.uk/wp-content/uploads/2021/05/Interim-multi-agency-protocol-on-children-and-young-people%E2%80%99s-mental-health-2021.pdf>

The school will ensure that staff have an understanding of trauma informed practice and its link with mental health and are able to recognise pupils who are experiencing mental health issues and help them to access the most appropriate help. Where there are safeguarding concerns arising from a pupil's mental health issues, staff will discuss concerns with the DSL to agree any actions to be taken.

The school will ensure that staff are teaching about mental wellbeing (as part of the statutory Health Education) to help reduce the stigma attached to mental and emotional problems and ensure pupils know how to keep themselves mentally healthy and know how to seek support.

The school will also ensure early identification of pupils who have mental health needs and put in place appropriate support and interventions, including specialist services, where needed.

The school will take account of the government guidance *Mental health and behaviour in schools*.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. 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 asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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. The following factsheets usefully summarise the new duties:

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation:

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheet>

SECTION 8 – EARLY YEARS SETTINGS WITHIN UCS

This section relates to The Pre-Prep

8.1 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 (EYFS) 2021 Foundation Years and guidance from the Local Safeguarding Children Partnership

The school also has regard to:

Keeping Children Safe in Education, 2021

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf

Working Together to Safeguard Children 2018

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Disqualification under the Childcare Act 2006 (updates August 2018)

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>

Information Sharing March 2015

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf

Prevent Duty Guidance for England and Wales (July 2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799 Revised Prevent Duty Guidance England Wales V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

And further non-statutory advice:

[The use of social media for on line radicalisation \(July 2015\)](#)

[Safeguarding Children and Protecting Professionals in Early Years Settings: Early Years online Safety Guidance for Practitioners and Considerations for Managers \(February 2019\)](#)

[Safeguarding children and protecting professional in early year settings: online safety considerations](#)

The school will ensure that children taught in 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.

8.2 Safeguarding and Child protection

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

The EYFS designated lead responsibility for safeguarding children is Nik Watt. This role includes liaison with local statutory children's services agencies, and with the LSCP. They provide support, advice and guidance to any other staff on an ongoing basis, and on any specific safeguarding issue as required. The lead practitioner attends child protection training every 2 years. There are a further 2 DSL for Safeguarding in The Pre-Prep, Dr Zoe Dunn, Head Teacher and Ms Sophie Ryan, SENDco.

Early years settings within the school will follow the child protection procedures set out in section 4 of this policy. These procedures are in line with guidance from the Local Safeguarding Children Partnership (LSBP.)

In addition, the school has the following child protection policies:

- Staff in the Early Years must not use their mobile phones in the classroom or when with the pupils. Staff are not allowed to use their own personal equipment (cameras or phones etc) to take images of pupils at or on behalf of the school setting. The school provides school iPads and cameras for documenting pupil work and achievements. Personal phones, iPads or other electronic devices should not be used in classrooms or where children are present. Images of pupils should not be taken out of the school. Please consult the Early Years Photography, Video and Images Procedure.
- On educational visits in the EYFS, staff have mobile phones but these are only to be used in emergencies.
- parents are generally prohibited from taking any photographs of children in the early years setting, 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.
- Parents are asked to sign a declaration stating whether or not they give permission for their child to be photographed in a school context
- Parents are politely asked not to use their mobile phones in the EYFS classrooms and to take phone calls outside of the school.

For parents of children in the Early Years Foundation Stage an official complaint may also be made to OFSTED in the event of an allegation of serious harm or abuse by any person working in the early years setting. www.ofsted.gov.uk and/or the ISI (Independent Schools' Inspectorate) www.isi.net.

Through the EYFS curriculum and school life, pupils are taught to adjust their behaviours in order to reduce risks and build resilience, including being safe when using electronic equipment and the internet. These are age appropriate and taught through PSED and PSHE, and utilise the CEOP *Thinkyouknow* resources, as well as other websites like childnet. Please consult the Online Safety policy for further detail and see the Pre-Prep School Staff, parent and pupil ICT User Agreements.

8.3 Suitable People

The school will follow the *Safer recruitment and staff conduct policy for schools and colleges* 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, have the relevant qualifications and are not disqualified from working in childcare settings.

This policy will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive proper 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 Camden policy "*Guidance of the management of an allegation against a member of staff*" as referred to in section 2 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 headmistress. Any medication on the school premise will be securely stored.

8.4 Staff Training Skills and Supervision

The school will ensure that all staff in early years settings have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy and the requirements of the Early Years Foundation Stage Framework.

Training and Induction will include (this is not an exhaustive list):

- General roles and responsibilities
- Emergency evacuation procedures
- Safeguarding and child protection
- Equality policy
- Health and safety issues
- Supervision of pupils and ratios

- Supervision of staff and opportunities for CPD and INSET

The EYFS Designated Safeguard Lead for Child Protection attends training every two years. All staff are trained on an annual basis at the Pre-Prep on school safeguarding and Child Protection. Training is annual for all staff in the Pre-Prep and EYFS setting. Staff keep up to date with safeguarding issues by regularly attending Local Authority termly update meetings. Training enables staff to identify signs of possible abuse and neglect at the earliest opportunity, and to respond in a timely and appropriate way. These may include:

- significant changes in children's behaviour;
- deterioration in children's general well-being;
- unexplained bruising, marks or signs of possible abuse or neglect;
- children's comments which give cause for concern;
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
- inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example: inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

All policies set out in the *Safer recruitment and staff conduct policy for schools and colleges* will apply equally to early years staff.

In the Pre-Prep the Headmistress oversees and coordinates the school's implementation of the Prevent Duty.

- Activities off the Premises
- Administering Medicines Policy
- Online Safety Policy
- EYFS Parent Handbook
- EYFS Photography, Video and Images Procedure
- Intimate Care Policy
- Use of Force Policy
- Supervision Policy

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 early years staff are able to communicate effectively in English both orally and in writing;

At least one member of staff must have a current paediatric first aid (PFA consistent with Annex A of the EYFS Framework) certificate and be on the premises and available at all times when the children are present and accompanies children on school trips.

Each child in the early years setting has a designated key person who liaises with parents to provide individual support for the child (The key person is the child's class teacher).

The school will ensure that staff levels within the early years setting comply with statutory guidance and can meet the needs of the children and keep them safe. Parents are kept informed of staff members and numbers and children are kept within staff sight and hearing at all times. (Please consult Supervision Policy). For reception classes:

- class sizes will be limited to 30 pupils
- classes will be led by a qualified teacher supported by suitably qualified support staff.
- For before and after school provision is staffed based on the age and needs of the children attending.

8.5 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 whilst attending the early years setting within 14 days.

8.6 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 sections 5.4 and 5.6 and 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 children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as policies for dealing with uncollected children. See: Missing Child Policy; Uncollected Child Policy. (Appendix 3.) The school will ensure that records of parents' details and contact numbers for emergencies are kept up to date.

Smoking and vaping will not be permitted on the school premises when children are present.

8.7 Managing behaviour

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened. However, staff will be permitted to use appropriate physical intervention

in line with Camden's *Physical intervention and restraint* policy. <https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies> and the school's Use of Force and Physical Restraint Policy.

We do not use physical restraint unless there are circumstances where there is danger to a child. Please refer to the Use of Force and Physical Restraint Policy. All staff are required to read and sign that they have read this policy. Any incidents of physical restraint or intervention will be recorded and shared with parents on that day or as soon as is reasonably possible.

No corporal punishment is used, nor is the threat of corporal punishment.

There may be times when pupils, mainly in the EYFS, need support for more intimate needs. This can include supporting a pupil with dressing/undressing; providing comfort or support for a distressed pupil; and cleaning a pupil who has soiled him/herself, has vomited or feels unwell. Parental permission will be sought in the EYFS. Please consult the Intimate Care Policy and the Pre-Prep Staff Handbook

Swimming and Changing

Whenever pupils are changing clothes for swimming or in the case of an incident of soiling, there will always be two adults present.

8.8 Records and information sharing

The school will ensure it keeps accurate records about the child which will be lawfully shared with others for the purposes of safeguarding children as set out in section 5.8 of this policy.

**APPENDIX 1 – SAFEGUARDING CHILDREN
MONITORING/INCIDENT FORM**

Senior School

Junior Branch

Pre-Prep

Name of pupil:

Date of birth:

Status: monitoring due to concerns subject to child protection plan

Concerns/risks

Contact with parents/family

Health and physical appearance

Periods of exclusion (including dates)

Behaviour and emotional presentation (including any sexualised behaviour)

Concerning incidents

Peer relationships

Academic performance and achievement

Views of child and parents:

Outcomes of monitoring

continue monitoring carry out CAF referral to FSSW

referral to health services referral for education support services

referral for behavioural support referral on behalf of parent/carer

Action Taken

Name and signature of staff member:

Date:

APPENDIX 2 – SAFEGUARDING BASIC INFORMATION RECORD

This record is to be placed at the front of the pupil's welfare record

Senior School

Junior Branch

Pre-Prep

Name of pupil:

Date of birth:

Address:

Pupil's status:

child in need

child protection

looked after

Parent/carer details:

Contact number:

Name of GP:

GP contact details:

Other agencies involved:

Name	Agency	Contact details

APPENDIX 3 – UNCOLLECTED CHILD POLICIES THE PRE-PREP AND JUNIOR BRANCH

1. Collection Procedure for Pupils at The Pre-Prep

Purpose

To ensure an uncollected child is returned to their parent/carer or agreed emergency contact as quickly as possible and with the minimum distress to the child. All children have an emergency contact list completed upon admission to school. This 'Parent Contact Sheet' is always taken off-site. Parents are reminded at regular intervals to keep this updated.

Reception end of day collection

- Door is opened at 3:00pm to allow children to leave with their parents.
- Staff call pupils to the blue door and ensure that all pupils are collected by the appropriate adult.
- Photo ID of parents and carers kept in classroom.
- List for changes of routine pick up on notice board in the classroom.
- After 15 minutes pupils who are left are taken to the school office, where the secretary will ring their parents.

Reception Wednesday afternoon collection

- Door is opened at 12:00pm to allow children who are not staying for Wednesday afternoon to leave with their parents. Children who are staying for Wednesday afternoon sessions, remain in the classroom where they are supervised by another member of staff.
- Staff call pupils to the blue door and ensure that all pupils are collected by the appropriate adult.
- Photo ID of parents and carers kept in classroom.
- List for changes of routine pick up on notice board in the classroom.
- After 15 minutes pupils who are left are taken to the school office, where the secretary will ring their parents.

Permission

The school needs to be informed in writing (i.e email) if someone new is to collect a child in the EYFS.

Years 1 & 2 end of day collection

- Classes in Years 1 & 2 are dismissed from both the Library and playground. Class teachers establish from which departure point their children will be dismissed and parents/carers are advised accordingly.

- Doors are opened at 3:10pm (Year 1) and 3:20pm (Year 2) to allow children to leave with their parents/carers.
- Staff call pupils to the blue door or black gate and ensure that all pupils are collected by the appropriate adult.
- After 15 minutes pupils who are left are taken to the school office, where the secretary will ring their parents.

Procedure if a child is not collected (onsite)

A child will always be looked after if a parent/carer is late for any reason. If a child is not collected at the end of a session, the following procedure will be followed:

1. 15 minutes after the designated collection time, the teacher in charge will ensure that the parent \ carer is contacted. If they are not available, the emergency contact will be phoned.
2. The teacher in charge will ensure a member of staff stays with the child and offers reassurance.
3. The teacher in charge will ensure the Head Teacher is informed of the situation to make any necessary staffing arrangements.
4. If the child has not been collected and no appropriate arrangements made by 1 hour after the end of a session the Head Teacher or teacher in charge will consult with the Head Teacher of the Junior Branch about contacting Social Services.
5. Upon contacting Social Services, a course of action specific to the circumstances will be made and the Head Teacher will ensure that the actions required of the school are completed and passed on to colleagues.
6. Until such a time as the child is passed on into the care of those within the actions agreed with the Social Services, the staff will continue to provide appropriate care and reassurance to the child.
7. As soon as practicable after the incident, the Head Teacher will record the incident and outcomes.

In the Event of a Child not being Collected Offsite

1. The member of staff waiting with the uncollected child, phones the School Office. If the School Office has had a message that the parent is running late, the member of staff is informed and waits with the child until the parent/carer arrives.
2. If no message has been received, the member of staff contacts the parent and informs them that the child is waiting for collection.
3. The child waits with a member of staff until the parent/carer arrives.
4. In the event of no contact being established, the child is brought back to school by the member of staff.
5. All contact numbers which relate to the child are tried until contact is made. The 'Parent Contact Sheet' is always taken off-site.
6. If no contact can be made after 30 minutes after the allocated pick-up time, the staff member should return to school with the child. If at all possible,

another member of staff should remain for a further 15 minutes. If the adult is alone with the child, then an on-site member of staff should be informed of the return to school.

Procedures if a Child has not been Collected after One Hour

1. If the child has not been collected and no appropriate arrangements made by one hour after the end of the designated finishing time, the Head Teacher or in her absence the Deputy will make a decision on whether Social Services should be contacted. This decision will only be made in consultation with another Senior Management Team member.
2. If neither the Head Teacher nor the Deputy are present and contact cannot be made with the Head Teacher or the Deputy, the Head Teacher of the Junior Branch will be consulted. If he is not able to be contacted, the Head Teacher of Senior School should be consulted.
3. If Social Services are contacted, the Head Teacher will agree with them a course of action specific to the circumstances and ensures that the actions required of the School are completed and passed on to colleagues.
4. Until such a time as the child is passed on into the care of those within the actions agreed with the Social Services, the staff will continue to provide appropriate care and reassurance to the child.
5. As soon as practicable after the incident, the Head Teacher will record the incident and outcomes in the appropriate log.

The pupil entrance is opened and manned at collection and drop-off times. Outside these times, the entrances are locked and access is through a video-phone.

2. Junior Branch

Background

All children have an emergency contact list completed upon admission to school. Parents are reminded at regular intervals to keep this updated. If a child is not collected at the end of a session, the following procedure will be followed.

Procedure

Rest assured, we will always look after your child if you are late for any reason but the following procedure will be adhered to:

1. Boys are allowed supervised play in the playground at the end of normal school time between 15:35 and 15:45.
2. At 15:45 a bell is rung. Any boy not collected by parent/carers at this time is brought either to Homework Club (in the Library) or to the reception area next to the Office. The parents/carers of any boy who is not waiting for collection at the end of Homework Club may be contacted during this period.

3. At 16:00, any boys still in the reception area transferred to Homework Club (Library). Parents/carers can collect directly from the Library during this time.
4. At 17:00 any boys not collected from Homework Club are brought back to the reception area by the office. A duty member of SMT will then make further calls to parents/carers and will supervise any boy on site until collection.
5. If no collection is made within a reasonable timeframe after 17:00, the duty member of SMT will contact social services will agree with the social services a course of action specific to the circumstances and ensure that the actions required of the school are completed and passed on to colleagues.
6. As soon as practicable after the incident, the Headmaster will record the incident and outcomes in the appropriate log.
7. 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.

APPENDIX 4 – PUPIL SAFEGUARDING AT UCS ACTIVE SPORTS CENTRE

Core Hours 0800 – 1600

Between the hours of 0800 – 1600 (core hours) the Foundation schools are the primary users of the sports centre but on occasions other members of the general public, other schools and contractors may well enter the centre. To ensure that pupils are fully safeguarded at all times whilst using the centre during the core hours the following regime will be followed:

1. Changing rooms and the swimming pool hall will be secured with entry only through locked and coded doors.
2. Door entry codes will be changed on a regular basis.
3. Only pupils and vetted UCS Foundation (UCSF) staff will be permitted entry to the changing rooms and swimming pool hall during the core hours.
4. All other areas of the sports centre (reception, sports hall, gym, fitness studio, teaching area) will be supervised by vetted UCSF staff whenever pupils are using these areas.
5. UCSF vetted staff will wear ID badges with a claret lanyard unless they are actively involved in sport.
6. UCSF vetted staff will ensure that on no occasion are pupils left unsupervised outside the secured areas of the sports centre.
7. Visitors to the centre will be required to sign in either by card - if they are UCS Active members - or in a visitors book if non-members.

After School Activities 1600 – 1800

Between 1600 - 1800 UCS Active is used by non-UCS children who attend for swimming lessons run by a separate company [Paul Dillon Swim School]. These children are normally escorted by adults who will enter the changing rooms and swimming pool hall. Between these hours a limited number of UCS pupils may be using the centre facilities as part of extra-curricular after school activities including Transitus and Sixth Form use of the gym, cricket net practice and occasional basketball matches. From 1745 private members start to arrive at the centre for club activities that commence at 1800.

The following regime will be in place between 1600 – 1800 to ensure the safeguarding of UCS pupils between these hours:

1. Locks will be off in the swimming pool hall and changing room.
2. Roving supervision will be in place for both changing rooms by gender appropriate, vetted, UCS Active staff.
3. At 1800 the UCS Active Duty Manager will be responsible for ensuring that all UCS pupils (other than those who are private members) have left the centre.

APPENDIX 5 – PUPIL SAFEGUARDING AT THE UCS PLAYING FIELDS

Given the nature of the UCS playing fields and the fact that we have no way of controlling visitors to the playing fields, which includes parents from both UCS and other schools, pupils and staff from other schools, Old Gowers, contractors and deliveries, we have designated the playing fields as a non-safeguarded site.

Pupils from all three schools in the Foundation are supervised at all times when they are at the playing fields by both teaching staff and grounds staff. It is the responsibility of those staff to ensure that only pupils and authorised adults from UCS and visiting schools have access to the changing rooms.