

# **The MULBERRY HOUSE SCHOOL CHILD PROTECTION (SAFEGUARDING) POLICY**

**This Policy includes the Early Years Foundation Stage, Key Stage 1 (the Prep Classes and After School Provision)**

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## Key contacts

### School

**Name of school: The Mulberry House School**

**The Proprietor takes overall responsibility for child protection:**

Name: Bethan Lewis- Powell

Contact details: 020 8452 7340 or 020 75692525

**Headteacher: Victoria Playford**

Contact details: 020 8452 7340

**Designated safeguarding lead:**

Name: Victoria Playford

Contact details: 020 8452 7340

**Deputy designated safeguarding lead:**

Name: Teresa Ferrari

Contact details: 020 8452 7340

### London Borough of Camden

**Local Authority Children's Board (CSCB):**

LSCB Development Officer:

Name: Dinishia Mitford

Contact: 020 7974 6658

Email: [Dinishia.Mitford@camden.gov.uk](mailto:Dinishia.Mitford@camden.gov.uk)

**Local Authority Designated Officer (LADO) & Child Protection Lead Officer:**

Name: Kurt Ferdinand

Contact details: 020 7974 4556

**Safeguarding lead officers:**

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

Tel: 020 7974 1905

Name: Tracey Murphy (Service manager)

Tel: 020 7974 4103

Name: Patricia Williams (Service manager)

Tel: 020 7974 1558

**Multi-agency safeguarding hub (MASH) team:**

Manager: Jade Green /David Jaggs

Tel: 020 7974 1553/3317

Fax: 020 7974 3310

**E-safety contact officer:**

Name: Jenni Spencer

Tel: 020 7974 2866

**Early Help/CAF/Transformation Team Manager:**

Name: Virginia Hurst

Tel: 020 7974 4388/8791

[Virginia.hurst@camden.gov.uk](mailto:Virginia.hurst@camden.gov.uk)

**Prevent Education Officer**

Jane Murphy  
0207 974 1008

**To report Female Genital Mutilation**

In urgent cases contact children's social care or police direct using 999 or 101.

**The Metropolitan Police Project Azure** contact number is 0207 161 2888.

## 1 Purpose of policy

**The aim of this policy is to safeguard and promote the welfare of children and help them to achieve good outcomes. We will achieve this by providing a safe learning environment and ensuring The Mulberry House School staff have the skills and knowledge to take action where children are in need of help or protection. The school is committed to safeguarding and acting in the best interests of the child.**

This policy sets out how we will meet our statutory duty under section 175 of the Education Act 2002 and Keeping Children Safe in Education (September 2018). In adhering to KCSIE we carry out Pre employment Checks including Barred list checks (adult barred list and Children's barred list) Prohibition from teaching, Prohibition from management, Disqualification under the Childcare Act 2006 (February 2015), What to do if you're worried a child is being abused (March 2015), Working Together to Safeguard Children (March 2018) including Information sharing (March 2015)

**Prevent Duty Guidance: for England and Wales (March 2015) Prevent is supplemented by non-statutory advice and a briefing note:**

The Prevent duty: Departmental advice for schools and child-minders (June 2015) The use of social media for on-line radicalisation.

**All staff will be supported in their safeguarding role, any member of staff may make a referral to external agencies.**

## 2 Roles and responsibilities

### 2.1 Camden Children Safeguarding and Social Work Division (CSSW)

CSSW (including Children's Safeguarding and Social Work) will support the school to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an early help service.
- providing statutory social work services under the Children Act 1989
- providing the school with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and e-safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officers (LADO).

## 2.2 Proprietor

The Proprietor (Bethan Lewis-Powell) will ensure that the school meets its statutory duties with regard to safeguarding and protecting pupils and in cases of investigations, she will take overall responsibility. The Proprietor has responsibility for liaising with Camden CSSW on safeguarding and child protection matters and links with the LADO in the event of an allegation against the Headteacher.

The Proprietor will also ensure that the following are in place:

- The school has the following policies in place and that these are regularly monitored, reviewed regularly and updated where necessary:
  - Safeguarding and child protection policies and procedures in place which are consistent with Camden Safeguarding Children Board procedures, including policies on Safe recruitment, e-safety and whistle blowing procedures.
  - A staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media.
  - Ensure all staff complete a disclosure/Declaration by Association form.
  - Third party checks to ensure the policy is being implemented and working in practice.
  - A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest that potential safeguarding risks may be present.
- We will 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.
- Through induction and 'Supervision meetings' termly, new and existing staff are given up to date copies of all relevant safeguarding and child protection policies and the staff code of conduct policy, behaviour policy and a copy of KCSIE part 1 and Annex A. The importance of whistle blowing is always emphasised and a copy of our CP policy is handed out.
- Pupils are taught how to keep themselves safe through stories, video clips and circle time/assemblies. Headteacher takes steps to ensure children are given opportunities within the curriculum to learn how online safety is taught through computing and PSHE.
- Parents are encouraged to read all our policies, particularly Child Protection. Training events are held regularly to ensure parents understand the risks for children online.
- The school has a rigorous Recruitment procedure documenting safe recruitment practices, including advert/application form/vetting and selecting in-line with KCSIE (September 2016) Statutory guidance is adhered to and this policy is reviewed on an annual basis.
- There is always at least one member of staff who has undertaken Safer Recruitment training. They are present during selection and interviews/ to oversee the recruitment process at the school.

- All staff receive safeguarding and child protection training **every year** from Camden or a specialist in the field. (September 2017)
- Volunteers receive training from the DSL. Staff who join mid year do an online course with NSPCC and also from the DSL before the annual Camden training.
- The school has procedures in place to deal with allegations of Peer-to-Peer abuse.
- The school has an attendance policy to advise on children who go missing from education. (See Attendance and Punctuality Policy)
- 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 The Headteacher

The Headteacher is the Designated Safeguarding Lead with responsibility for carrying out the statutory duties on a day to day basis, as set out in this policy. She is given sufficient time and resources to carry out her responsibilities.

- The DSL, the **Deputy DSL** Teresa Ferrari and the Proprietor Bethan Lewis Powell all receive Level 3 training every 2 years which includes interagency working.

- There is a designated teacher nominated to promote the educational achievement of looked after children (Victoria Playford) and she has received training for this role.
- Staff are inducted thoroughly so that they are fully aware of the school safeguarding and child protection policies, behaviour policies and the CSCB children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals to CSSW.
- Staff are able to work in partnership with other agencies to safeguard children, including 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. (see Safer Recruitment policy)
- The Headteacher brings Safeguarding issues to the attention of the Proprietor immediately and are also discussed at termly meetings.
- The policy is reviewed annually or following any regulatory or government update. All changes and reviews are shared with staff on a weekly basis and Safeguarding and child protection always forms part of the weekly agenda. These reviews are shared with the proprietor, Bethan Lewis-Powell at termly meetings.

## **2.4 Role of the Designated Safeguarding Lead (Victoria Playford) (See Job Description)**

The role of the Designated Safeguarding Lead and their deputy is to take lead responsibility for safeguarding and child protection within the school/college and to be available during school hours for staff to discuss safeguarding concerns:

### **Additional procedures**

*Individual schools/colleges should record how this will be managed, for example through use of a rota or special telephone number to ensure that advice from the designated lead or their deputy is available during school hours.*

The designated safeguarding lead (and their deputy) will:

- liaise with and manage referrals to relevant agencies such as Family Services and Social Work (CSSW), the LADO, the Channel Panel and the Disclosure and Barring Service (DBS)
- keep the Proprietor informed of on-going safeguarding and child protection issues and enquiries
- provide advice and guidance for staff on safeguarding and child protection issues and making referrals
- ensure the school's safeguarding and child protection policies are up to date and consistent with Camden's Safeguarding Children Board policies and that policies are reviewed annually
- ensure all staff, including temporary staff, are aware of and understand the policies and procedures and are able to implement them
- attend regular training including prevent awareness training and the designated teachers meetings hosted by Camden in order to keep up to date with new policy, emerging issues and local early help safeguarding and child protection procedures and working practices
- have an awareness of those children who may be in need, 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
- oversee child protection systems within the school, including the management of records, standards of recording concerns and referral processes
- provide a link between the school and other agencies, particularly FSSW and the Camden Safeguarding Children Board
- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training at least every 2 years
- ensure parents are fully aware of the school policies and procedures and that they are kept informed and involved
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer.

## 2.5 Working with parents and carers

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

The school will:

- make parents aware of our statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary (prospectus). In addition, all The Mulberry House School policies are available on the school website or on request.
- provide opportunities for parents and carers to discuss any problems with The Headteacher/Key Person/class teachers at weekly parental consultations/ termly meetings and the EYFS 2 Year Progress Checks.
- Through our parent Reps we consult with and involve parents and carers in the development of The Mulberry House 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. (see Complaints policy)
- provide advice and signpost parents and carers to other services and resources where pupils need extra support.

• **Additional policies:**

1.1. *Whistle blowing*

1.2. *E-Safety*

1.3. *Procedure for Management of Allegations against a member of staff*

1.4. *Prevent*

1.5. *Safer Recruitment*

1.6. *Supervision*

1.7. *Parental involvement*

## 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.

## 3 Safeguarding children

The Mulberry House School promotes the highest standards of care and education enabling children to have optimum life chances so they can enter adulthood successfully. We will continue;

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensure children are growing up in circumstances consistent with the provision of safe and effective care; and (in cases where there is suspected Domestic abuse)
- taking action to enable all children to have the best outcomes

*To achieve these aims The Mulberry House School will:*

- identify children who need extra help at an early stage and make appropriate referrals for an early help service to prevent concerns

escalating and put in support where necessary. 2 year Progress checks and IEPs

- identify children who may be suffering from significant harm and make a child protection referral to CSSW
- 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.

DLSs and all professional staff should, in particular, be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime;
- children who frequently go missing from home, school or care;
- children who are misusing drugs or alcohol;
- children at risk of exploitation through modern slavery and trafficking;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care;
- children at risk of radicalisation;
- privately fostered children;
- and/or is showing early signs of abuse and/or neglect.

We recognise specifically the particular vulnerabilities of children with SEN/D to abuse. Children with special educational needs (SEND) and disabilities can face additional safeguarding challenges and we recognise that additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

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

The Mulberry House School will refer to Camden's thresholds and eligibility criteria (2015) and follow safeguarding procedures in line with local procedures as specified from Camden's Children Safeguarding Board.

**Referral for early help services** will be made through an e-CAF referral to Camden's Early Help/CAF team for children with low-level needs who may need extra services which cannot be provided by The Mulberry House School to help them achieve good outcomes. Additionally, Notification of Concern in



Early Years Foundation Stage. Staff will consult with parents prior to making any referral in order to obtain consent to refer the child.

Parental consent for referral will be sought but a referral will be made regardless of consent being given in cases where the child is at risk or significant harm.

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.

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.

**Referral for a social work service** will be made by way of an e-CAF referral to the CSSW MASH team for children with medium level needs who are likely to be assessed as being 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. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.

**Child protection referrals can be made by phone or an e-CAF** to the FSSW Child and Family Contact team under the procedures set out in section 4 for any child where there are concerns about significant harm.

#### **Additional policies and guidance**

[www.nspcc.org.uk](http://www.nspcc.org.uk) and [Department for Education - GOV.UK](http://www.gov.uk)

Anti-discrimination & harassment

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/361008/Advice\\_on\\_school\\_attendance\\_sept\\_2014.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/361008/Advice_on_school_attendance_sept_2014.pdf)

*Child sexual exploitation*

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/278849/Safeguarding\\_Children\\_and\\_Young\\_People\\_from\\_Sexual\\_Exploitation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278849/Safeguarding_Children_and_Young_People_from_Sexual_Exploitation.pdf)

*Behaviour and discipline*

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/392489/behaviour\\_and\\_discipline\\_in\\_schools\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/392489/behaviour_and_discipline_in_schools_statutory_guidance.pdf)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/277894/Behaviour\\_and\\_Discipline\\_in\\_Schools\\_-\\_a\\_guide\\_for\\_Head\\_of\\_Curriculum\\_and\\_school\\_staff.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277894/Behaviour_and_Discipline_in_Schools_-_a_guide_for_Head_of_Curriculum_and_school_staff.pdf)

*Bullying (including cyberbullying)*

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288444/preventing\\_and\\_tackling\\_bullying\\_march14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288444/preventing_and_tackling_bullying_march14.pdf)

Children missing from school  
 School [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/268987/cme\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268987/cme_guidance.pdf)  
 Complaints  
 Domestic violence  
 Drugs/substance misuse  
 Educational visits  
 E-safety  
 Equality and diversity  
 Exclusion of pupils  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/269681/Exclusion from maintained schools academies and pupil referral units.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/269681/Exclusion_from_maintained_schools_academies_and_pupil_referral_units.pdf)  
 Fabricated or induced illness  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/277314/Safeguarding Children in whom illness is fabricated or induced.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf)  
 Faith abuse  
 Female genital mutilation  
 First aid and administration of medicines  
 Forced marriage  
 Gangs and youth violence  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288804/Safeguarding children Gang activity.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288804/Safeguarding_children_Gang_activity.pdf)  
 Gender based violence, violence against women and girls  
 Health and safety  
 Intimate care  
 No smoking (EYFS)  
 Mental health  
 Physical intervention  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/268771/use of reasonable force - advice for Head of Curriculum staff and governing bodies - final july 2013 001.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268771/use_of_reasonable_force_-_advice_for_Head_of_Curriculum_staff_and_governing_bodies_-_final_july_2013_001.pdf)  
 Private fostering  
 Promoting British values/Radicalisation and violent extremism  
[Promoting fundamental British values through SMSC - Publications - GOV.UK](#)  
 Risk assessments  
 Safe recruitment  
[Keeping children safe in education - Publications - GOV.UK \(2016\)](#)  
 SRE  
 Sexting  
 Staff code of conduct  
 Teenage relationship abuse  
 Trafficking  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/177033/DFE-00084-2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf)  
 Whistle-blowing

## 4 Child protection procedures

### 4.1 Role of school

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

[Working together to safeguard children - Publications - GOV.UK](#)

- What to do if you're worried a child is being abused (2015)
- **The London Safeguarding Children Board Child protection procedures (2016)**

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

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

### 4.2 Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the Designated Safeguarding Lead.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. However, this is not essential, anyone can make a referral to MASH/OFSTED
- Concerns may be monitored over time and recorded on the monitoring/incident form shown at appendix 2. Details of any concerning incidents should also be recorded on this form.

### 4.3 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, allowing 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 the CSSW MASH team;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- not ask direct questions but allow the child to tell their story;
- not criticise the alleged perpetrator;
- explain what will happen next and who has to be told;
- make a formal record and pass this on to the Designated Safeguarding Lead.

**The school will always work in the best interests of the child and take action to enable all children to have the best outcomes.**

#### **4.4 Referral**

- A decision on whether or not to refer a pupil to the CSSW should be made by the Designated Safeguarding Lead or their deputy following a discussion with the member of staff who has raised concerns. However this should not delay any referral and any member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior management team and take advice from the Child and Family Contact team social worker.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with Camden’s Child and Family Contact team social worker to obtain advice on how to proceed.
- Referrals should be in writing using an e-CAF referral completed either by Designated Lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the e-CAF referral within 48 hours.
- Parental consent will be sought (although this is not essential) prior to the referral being made **unless** to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- If the child already has an allocated 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. (children at MHS reside in Brent/Barnet/Westminster also)
- All referrals will be acknowledged by the Child and Family contact team within 24 hours and the referrer informed of what action will be taken.
- If the school does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with CSSW/Early help services via the designated safeguarding lead.

#### **4.5 Attendance at case conferences and core groups**

- The designated safeguarding lead 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 designated safeguarding lead will ensure that the school is represented at child protection case conferences and core group meetings:
  - where possible, a member of staff who knows the child best, such as a class teacher or key person will be nominated to attend in addition to the Designated Safeguarding Lead or their deputy will attend

- if no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

#### **4.6 Monitoring**

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

- monitoring will be carried out by the relevant staff member in conjunction with the Designated Safeguarding Lead
- all information will be recorded on the child protection monitoring/incident form shown at appendix 2 prior to each conference and core group meeting
- the completed monitoring form will be kept on the pupil's separate child protection file (that should be separate from The Mulberry House School record) and copies made available to all conferences and core group meetings
- the designated safeguarding lead will notify the designated social worker if the child is removed from The Mulberry House School roll, excluded for any period of time, is absent for sustained periods without notice or goes missing from education

#### **4.7 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 school.
- The designated safeguarding lead 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 2) 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
  - 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.

- Where a child who is subject to a protection plan transfers to another school, the designated safeguarding lead is responsible for ensuring that copies of all relevant records are passed to the designated safeguarding lead at the new school.
- Child protection records will be kept until the pupil leaves the school and should be passed on to the next school as confidential.
- Child protection records will only be kept until the pupil leaves the school and should be disposed of as confidential waste.

#### **4.8 Confidentiality and information sharing**

- All information obtained by school staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers.
- Where a child is at risk of suffering significant harm, schools and colleges 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, the school must share any information about the child requested by CSSW.
- **Parental consent to making a child protection referral** should not be sought in instances of suspected Sexual Abuse but in other instances parents are consulted about the referral. Before taking this step, the school should consider the proportionality of disclosure against non-disclosure; **is the duty of confidentiality overridden by the need to safeguard the child?**
- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, the school 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 or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the Child and Family Contact team social worker.

#### **4.9 Children who harm other children or PEER to PEER abuse**

Where a pupil's behaviour causes harm or significant distress to another pupil, (for example through violent or sexually abusive behaviour, cyber

bullying, initiation/hazing), the school will refer the child to CSSW Child and Family Contact team social worker under the *Children who harm other children* procedures. It is expected that all children involved, whether perpetrator or victim, are to be treated as being “at risk”. Victims will be supported initially through the school’s pastoral support teams, and as appropriate by more expert professionals as advised by Children’s Social Care or other appropriate advisory channels, such as the Police.

Staff should recognise that children are capable of abusing their peers. Our various anti-bullying and behaviour strategies seek to minimise the risk of peer on peer abuse. Should a child make an allegation of peer on peer abuse, it should be investigated and dealt with at the first stage by the teacher initially handling the disclosure, usually supported by the child’s class teacher. If concerns are raised, then the investigation should include more senior staff, including the pastoral care coordinator and parents of both victim and perpetrator should be included in resulting discussions. Different forms peer on peer abuse can take place, make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Peer on peer abuse can manifest itself in many ways, not just through physical bullying or on-line sexting, such as controlling behaviour, coercive behaviour, honour-based violence or ‘stalking’. Different race and gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

The DfE provides searching screening and confiscation advice for schools [here](#). Child Exploitation Online Protection Centre (CEOP) has recently updated their sexting guidance:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/545997/Sexting\\_in\\_schools\\_and\\_colleges\\_UKCCIS\\_4.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/545997/Sexting_in_schools_and_colleges_UKCCIS_4.pdf)

### **The child’s wishes:**

Where there is a safeguarding concern, we ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. When interviewing children, we will do so confidentially and enable the child to express their views and give feedback, and ultimately our systems and processes will operate with the best interests of the child at their heart.

### **Support to families**

- The School takes every step in its power to build up trusting and supportive relations among families, staff and volunteers in the group.
- The School continues to welcome the child and the family whilst investigations are being made in relation to abuse in the home situation.
- Confidential records kept on a child are shared with the child’s parents or those who have parental responsibility for the child only if appropriate under the guidance of RBWM Children’s Social Care.
- With the proviso that the care and safety of the child is paramount, we do all in our power to support and work with the child’s family.

#### **4.10 Prevention of radicalisation**

The designated Safeguarding Lead has undertaken training on how to identify, children, young people and staff who are at risk of radicalisation. The DSL has cascade trained all Staff in the Prevent Duty. 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, see ***The Mulberry House British Values Statement*** and government guidance via the link below:

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

Under Counter-Terrorism and Security Act 2015, the school 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.

[\[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/417943/Prevent\\_Duty\\_Guidance\\_England\\_Wales.pdf\]](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_Guidance_England_Wales.pdf)

Where a staff member may have 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, they should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.

The designated safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools officer (if they have one), the Police Prevent Engagement Officer (Gareth Tuck, [gareth.tuck@met.pnn.police.uk](mailto:gareth.tuck@met.pnn.police.uk) or call 07818 587 396) and Camden's Prevent co-ordinator (Jane Murphy, 020 7974 1008) or the DfEnon-emergency helpline: 02073407264

To make a referral to the Channel Panel, the school will first refer the young person to the MASH team using an e-CAF in the same way as for other safeguarding referrals. Where possible, the school should gather any relevant evidence, for example correspondence with parents, internet history and visited websites, notes from meetings to discuss concerns and behaviour, and known associates.

When making a referral, if the referral is considered appropriate for Channel support, a representative from school will be invited to the multi-agency panel meeting to provide information on the concerns that have been noted, and contribute perspectives on the most appropriate support that should be offered to the pupil and/or family.

**Where necessary additional procedures will be implemented in the context of the ages of the children attending The Mulberry House School (2-7)**



## 5 Early Years

### 5.1 Legal and policy framework

As an early years provider delivering the Early Years Foundation Stage (EYFS), The Mulberry House School aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance. In cases of abuse or allegations of abuse the Headteacher, together with the Proprietor, will notify Ofsted within 14 days.

The Proprietor, together with the Headteacher and EYFS co-ordinator, will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for the next stage of school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are child protection concerns.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for schools can be found on the [TES](#), [MindEd](#) and the [NSPCC](#) websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites, all links via the [KCSIE 2018 guidance](#):

- bullying including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- honour based violence
- forced marriage
- missing children and adults
- private fostering
- preventing radicalisation – and Annex A relationship abuse sexting
- trafficking
- peer to peer abuse

### 5.2 Safeguarding and child protection

**All safeguarding and child protection policies listed in sections 3 and 4 of this policy will apply equally to children in Early Years Foundation Stage classes so far as they are relevant to that age group.**

**In addition, The Mulberry House School has the following child protection policies (also see appendices):**

- An **E-Safety** policy on the use of mobile phones and cameras within the early years setting; which states:
  - parents and carers are asked to switch off mobile phones if they are coming into the school and leave if they need to use their mobile
  - parents are generally prohibited from taking any photographs of children in the school, but for special events such as The Mulberry House School performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared. The Headteacher speaks to the groups in advance of the performance.
  - staff seek parental permission to take photographs of the children using I pads for E-Profiles, which are only linked to teaching the curriculum. Only The Mulberry House School equipment is used for this purpose
  - staff and parents/visitor are prohibited from using mobile phones anywhere in the school. Personal mobile phones are to be used offsite only in emergencies and the staff room during breaks.
- Independent Schools Inspectorate/ Ofsted will be notified in the event of an allegation of serious harm or abuse by any person working in the early years setting. See Allegations against a member of staff policy)
- Children are taught how to stay safe on-line. (*Please see our E-safety Policy*)

### **5.3 Suitable people**

The Mulberry House School will follow the **Safer Recruitment policy** set out in section 6 of this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children and have the relevant pre- employment checks, declarations and qualifications.

Staff policies set out in section 6 of this policy will apply equally to staff and volunteers in the early years settings, and The Mulberry House School will ensure that they receive proper training and induction so that they are aware of their role and responsibilities, all The Mulberry House 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 setting, The Mulberry House School will follow the Camden policy **Guidance of the management of an allegation against a member of staff** as referred to in section 6 of this document and **appendix number 7**.

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

## **5.4 Staff training, skills and supervision**

The Mulberry House School will ensure that:

- all staff in the early years have the relevant qualifications and skills for their role.
- They receive induction as part of their probationary period
- They receive child protection and safeguarding training in line with Camden and this 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 foundation stage and key stage one staff are able to communicate effectively in English both orally and in writing
- all teaching staff hold a current paediatric first aid certificate. They are deployed in both buildings are available at all times and accompany children on school trips
- each child in the early years setting has a designated keyperson who liaises with parents to provide individual support for the child.

## **5.5 Staff ratios**

The Mulberry House School will ensure that:

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

### **The Squirrels' class:**

- there will be at least one member of staff for every 4 children
- at least two members of staff will hold a full and relevant level 3 qualification.

### **Otters' variable termly with number of rising 3s – Transition classes**

- there will be at least one member of staff for every 8 children
- at least two members of staff will hold a full and relevant level 3 qualification.
- there will be at least one member of staff with Early Years Teacher status

### **For Prep I A & E Reception classes:**

- class sizes are typically 20 pupils
- classes will be led by a Level 6 qualified person along with another suitably qualified staff member.

## **5.6 Health**

The Mulberry House School will:

- promote the health of children in the early years and Key stage one
- 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.(RIDDDOR)

### **Health and safety and suitability of premises**

The Mulberry House School will ensure that all indoor and outdoor spaces and facilities used are safe and fit for purpose and comply with The Mulberry House School policies and standards for site safety and health and safety as set out section 8 of this policy. Additionally, The Mulberry House School will ensure that all potential hazards and school trips are regularly risk assessed.

The Mulberry House 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.

#### **Additional procedures**

- Collection policy
- Risk assessments
- Uncollected child procedure policy
- Sick child procedure policy
- Emergency accident procedure policy
- Health and Safety policy and procedures

## **6 Safe recruitment**

### **6.1 General principles**

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

The school will follow the *Keeping children safe in education* guidance (DfE 2018).

[Keeping children safe in education - Publications - GOV.UK](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

Please also refer to the Safer Recruitment guidance saved on the school website.

- The school will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles, in accordance with statutory requirements. No staff member or volunteer will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed. The school Proprietor is also subject to these checks and those involved in management of the school.

- Enhanced Disclosure and Barring checks will be carried out at the level appropriate to the candidate's role in The Mulberry House School (see section 6.3).
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safe recruitment practices.
- The Headteacher sits on the interview panel and has undertaken Safer Recruitment training. This was with the accredited safer recruitment training offered through the Camden Safeguarding Children's Board.
- Although the Headteacher will have day-to-day responsibility for the recruitment of staff, the Proprietor will ensure that they maintain an overview of recruitment systems in order to scrutinise practice and ensure all statutory checks are carried out.
- In addition to the Headteacher and SLT, staff with responsibility for carrying out recruitment checks must ensure the school has a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- The Headteacher, together with her P.A. will be responsible for keeping a Single Central Record of all staff and volunteers who work at the school which includes details of all checks carried out and the outcome of these checks in the most up to date format (ISI June 2016).
- Where the school has salaried trainee teachers, the school will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.
- For trainee teachers, The Mulberry House School will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children.
- Where staff are recruited via third parties such as employment agencies, the Headteacher and Proprietor will:
  - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual including Barred list and Prohibition from teaching/management, right to work in the UK
  - request written confirmation of the outcome of all checks
  - request written confirmation that an enhanced DBS certificate has been received by the agency
  - check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

## **6.2 Checks to be taken out**

The school will verify the following information for all new staff:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address but be provided.

- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked in the presence of the applicant.
- Where the applicant will be involved in regulated activity, an enhanced DBS check is carried out, including information from the Barred list and Prohibition lists (teaching and management) If the applicant will begin work before an enhanced DBS check is received a risk assessment is carried out. This person will not have unsupervised access to children.
- In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on TRA Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.
- Where the applicant has been living abroad for 6 months or longer, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach.
- Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role. Post offer of employment, medical fitness form.

### 6.3 References

- Applicants will be asked to provide a full employment history and details of at least 2 referees. This must include their most recent employer. All references will be taken up prior to interview and will be requested directly from the referee. Headteacher references from schools will only be accepted. Referees will be contacted to resolve any issues that emerge from the references provided.
- If a candidate applying for a teaching post is not currently teaching, the school will contact their former school to obtain a reference in addition to their most recent employment. The application form requests reasons for leaving and this may be verified.
- The school keeps copies of the following documents on staff personnel files:
  - documents used as proof of identity such as passports or driving licences
  - a summary of the DBS certificate (but all other documents relating to the DBS check must be destroyed)
  - documents that prove the staff member's right to work in the UK

### 6.4 DBS checks

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

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

- teaching
- supervising
- care
- guidance and advice
- personal or intimate care.

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

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

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

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by the Headteacher and the following will be taken into consideration when deciding on this:

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

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

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

## **6.5 Volunteers**

The Headteacher will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany pupils on The Mulberry House School outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that is appropriate and proportional to the duties assigned to them.
- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children

should be subject to an enhanced DBS check, including barred list information.

- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but this may not include a barred list check.
- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the Headteacher will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:
  - the nature of the role
  - what information is already known about the volunteer
  - what references from work or volunteering activity the volunteer has provided regarding suitability
  - whether the role is eligible for an enhanced DBS check.
- The school will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.
- Volunteers carrying out regulated activity but for whom a DBS check has not yet been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers are inducted in relation to all The Mulberry House School policies and procedures.

This section also applies to The Mulberry House School's:

*-Policy for Volunteers*

*-Induction Policy*

## **6.6 Alternative education provision**

- Whenever the school places a pupil with an alternative education provider, the school will obtain written confirmation of the provider's safeguarding and child protection policies and ensure that appropriate safeguarding checks on individuals working at the establishment have been carried out.

## **7 Staff practice and conduct**

### **7.1 Induction and training**

- The Headteacher has been appointed by the proprietor, to take on the role of the DSL. The Headteacher must ensure that all staff are fully inducted, this includes: the identity of the designated Safeguarding Lead, the school's child protection policy, staff code of conduct, behaviour policy, children missing from education policy, e-safety policy, whistle blowing policy, part one of Keeping Children Safe in Education 2018 and Annex A – whistle blowing procedures/policy, acceptable use of ICT, school's code of conduct, staff/pupil relationships and use of social media and other communications and that staff are fully aware of their role in implementing these. Staff will be asked to confirm in writing that they have received all relevant staff



policies, including guidance on what to do if they are worried a child is being abused.

- The designated safeguarding lead will ensure that all staff are fully inducted with regard to the school child protection procedures and that they receive safeguarding and child protection training on a yearly basis.
- The DSL and Deputy DSL will provide regular updates for all staff and all safeguarding and child protection matters will always be presented as an agenda item on weekly staff meetings.
- The Headteacher will keep a central record of all statutory and other training undertaken by staff members, the proprietor and volunteers.
- School staff and the Proprietor will receive multi-agency safeguarding training provided by Camden Safeguarding Children Board at the relevant level.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses provided by Camden SCB.
- School staff will also receive training on the use of the Common Assessment Framework assessment and referral process as part of their safeguarding training.
- School staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation.

## 7.2 Conduct and safe teaching practice

- The school expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- The Headteacher will ensure that there is a written code of conduct in place which each member of staff, including volunteers, signs this agreement on appointment that sets out the school expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies. See **Staff Code of Conduct**.
- Staff and volunteers should be aware of current guidance on safe teaching practice contained in the DCSF “*Guidance for safer working practice for adults working with children & young people*” (2009).  
<http://www.childrenengland.org.uk/upload/Guidance%20.pdf>
- Staff will be expected to follow the school’s **E-Safety Policy**.  
Camden Essentials: HR model policies for schools
- Where a member of staff has been dismissed for misconduct, due to unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence, the school reserves the right to refer their staff member to the National College for Teachers and Lecturers.

## 7.3 Providing intimate or personal care to pupils

Staff may need to provide intimate or personal care to younger pupils, for example helping a child who has soiled themselves or supervising pupils who are changing for P.E.

Children should be encouraged to carry out self-care tasks for themselves where appropriate, but where adult intervention is needed, the following should be observed:

- Staff should follow the agreed The Mulberry House School policy for providing **Intimate Care Policy and Nappy Changing Procedure** See Appendix no 7.
- When taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen.
- Parents should always be notified if 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.
- When children are changing, levels of supervision should be appropriate to the pupil's age.
- Staff should avoid any physical contact unless a child needs help.
- Staff should ensure that changing areas are private and that others are not able to enter whilst children are changing.

#### **7.4 Behaviour management, physical intervention and restraint**

It is the school policy to use physical intervention and restraint only in line with Camden CSF policy "*Physical intervention policy for schools and centres*".

*Guidance from the Department of Education provides schools with the powers to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at:*

[Behaviour and discipline in schools - Publications - GOV.UK](#)

*However, Camden strongly advises schools:*

- *not to carry out non-consensual searches of pupils or their bags or lockers except in the presence of the safer schools police officer*
- *only to use reasonable force where there is a risk of harm to the pupil or others or a risk of substantial damage to property*

*The school is familiar with and adheres to Camden's local policies on bullying, use of physical restraint and guidance on carrying out searches of pupils. See **Behaviour Management** and **Physical Intervention Policies**.*

#### **7.4 Music tuition**

*It is recognised that music tutors 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.*

*The Music teacher is 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:*

- *ensures they behave in an appropriate manner and maintain professional boundaries at all times*
- *only uses 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*
- *makes sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why. They will ask the child's permission first and respect their wishes*
- *they will report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken.*

*The school will:*

- *ensure other staff are present during music lessons.*
- *make sure music teachers are aware of the school's safeguarding and staff conduct policies prior to starting.*

## **7.5 Allegations against staff**

In the event that an allegation is made against a member of staff or volunteer, the school will follow Camden's "*Guidance for the management of an allegation against a member of staff*".

[Policies / Guidance | Camden Safeguarding Children Board](#)

The Proprietor has appointed the Headteacher as The Mulberry House School representative for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

All allegations in relation to staff members will be referred to the Headteacher; allegations against the Headteacher will be referred to the Proprietor. The Headteacher will not be informed of any allegations made against her.

In the first instance, and always prior to any internal investigation taking place, the School will contact the LADO at RBWM for further professional advice and discussion within one working day (contact details below). We will discuss with the LADO the content and context of the allegation and will agree a course of action, including any involvement with the Police. Discussions will be recorded in writing and communication with both the individual and parents of the child/children agreed. For the avoidance of doubt, the School does not require parental consent before reporting allegations to the LADO.

Where a staff member is removed or resigns from the school prior to or following the upholding of an allegation against that person and the

responsible staff member and the LADO agree that the person is unsuitable to work with children, the responsible person will refer the individual to the DBS.

The DBS referral form and guidance for completing the form can be accessed on line via the DBS website at:

[Disclosure and Barring Service: criminal record checks, referrals and complaints - Detailed guidance - GOV.UK](#)

## 7.6 Whistleblowing

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

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

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

- Camden’s lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil;
- Camden Council’s confidential and independent help-line for protected disclosure on **0800 734199** or the Ofsted whistle-blowing line on **0300 123 3155** where there are issues regarding the school/college’s overall procedures around safeguarding.
- NSPCC whistleblowing helpline – 0800 028 0285

The Headteacher is responsible for ensuring that these numbers are advertised on The Mulberry House School premises and made available to staff and pupils.

### **Additional policies**

- *The Staff Handbook*
- *The Staff Code of Conduct*
- *Confidentiality Policy*
- *Statement of Intent*
- *Involving Parents and Children Policies*
- *Behaviour management and Physical Intervention Policies*
- *Whistle Blowing and the Procedure for the Management of Allegations Policies*
- *The Management of Medicines policy*
- *Intimate and personal care policy*
- *E-Safety Policy*
- *Supervision Policy*

## **8 Health and safety and risk assessments**

### **8.1 Responsibility for health and safety**

The Proprietor and Headteacher will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within The Mulberry House School environment.

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

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/279429/DfE\\_Health\\_and\\_Safety\\_Advice\\_06\\_02\\_14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/279429/DfE_Health_and_Safety_Advice_06_02_14.pdf)

Day-to-day responsibility for health and safety issues in the school will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training.

They are:

**Name: Maria Fojo Nebril**  
**Designation: Deputy Headteacher EYFS**  
**Contact details: 020 84527340**

### **8.2 Risk assessments**

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

- on an annual basis for The Mulberry House School environment as a whole
- for all The Mulberry House School trips
- for pupils travelling between locations during The Mulberry House School day
- for all work-based learning or work experience placements
- when a pupil who has been excluded for risky or violent behaviour is returning to the school
- whenever there are any changes to The Mulberry House School environment or The Mulberry House School practices
- following any serious incident.

### **8.3 Working with aggressive and violent parents**

If the school is working with a family who are known to CSSW and there are concerns about the behaviour of parents towards members of staff, this must be discussed with the Headteacher and the designated safeguarding lead and the information shared with CSSW.

If there are high levels of risk involved in contact with parents, CSSW may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that the school is part of this process.

### **8.4 Site security and visitors**

- The Proprietor and Headteacher are responsible for the security of The Mulberry House School premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The Headteacher will decide whether or not contractors should be subject to DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, the Headteacher will request written confirmation that relevant checks have been carried out for that individual. This applies to visiting speakers who will have access to children.
- All visitors and contractors will be:
  - informed to report to reception on arrival;
  - expected to provide proof of identity
  - expected to wear a name-badge or carry some form of identification at all times when on the school premises;
  - suitably supervised by school staff at all times;
  - made aware of school health and safety procedures.
- The Headteacher and the Proprietor will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils. (these will be checked in advance to ensure they are promoting British Values and the Rule of Law.

### **8.5 Use of The Mulberry House School premises by other organisations**

The school will only allow use of The Mulberry House School premises by other organisations schools within of The Mulberry House School hours for the purposes of providing supplemental schooling if:

- the organisation provides an overview of what it intends to teach so that the Proprietor is able to make a judgement on whether this is in line with the promotion of British values
- the organisation can provide evidence that they have followed safe recruitment practices and that their staff have the requisite DBS checks
- the following reasonable and due diligence checks are taken out on the organisation by the school;
  - an internet search on the organisation
  - checks with Camden's Community Groups and Schools Consultant (020 7974 7319)



- checks with Camden’s Channel Officer (0207 974 6050)
- checks with Camden Community Safety and the local police (0207 974 2915)

## 8.6 Monitoring and review

To enable the school to monitor the safety of the premises and The Mulberry House School environment, as well as the implementation of policies, the Headteacher and the Proprietor will ensure that:

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

## 9 Children who are missing from education or home educated

The Mulberry House School recognises that children who are persistently absent or missing from school may be an indicator of welfare concerns.

The Mulberry House School is aware of and adheres to Camden’s belief that:

*Attendance policies should state clearly who needs to be notified and what action should be taken and any relevant timescales. Schools should refer to Camden’s “Children missing from education” policy and the CSCB missing children protocol for further details available at: [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Board](#)*

Where a parent notifies The Mulberry House School that they are removing the child so they can be educated at home, the following notifications will be made:

- The Education Welfare Service must be notified of all decisions.
- If the child is already known to CSSW, their allocated social worker should be notified immediately.
- If the child is not known to CSSW, but The Mulberry House School has concerns about their welfare, the designated safeguarding lead should make a referral to CSSW.

- **Additional policies**
- *Attendance and Punctuality Policy*

## **10 Non-collection of children from school (see *Uncollected Child policy*)**

### **B1 Non-collection of children from school**

The Mulberry House School has a collection policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide the details of the person who will normally collect the child and will be informed of the need to notify the school office in advance, if this changes, giving written details of the person authorised to collect the child. Parents will also be asked to inform the school where children are subject to court orders that limit contact with a named individual. 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.

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

If a child is uncollected at the end of the school day, we will follow the procedure agreed with CSSW:

- The school will check with the child to see if there are any changes to arrangements for collection and try to make contact with the parent or other family members, and wait with the child until someone comes to collect them.
- Children will not be released into the care of another parent even where they offer to take the child home.
- The Mulberry House School will contact the Child and Families Contact Services to put CSSW on notice at 4.00 pm if there are difficulties in contacting parents or other family members for core day children. For children on fulltime and afternoon places at the school, the notice for the CSSW will be 5.45pm. The notice for CSSW for children on morning places will be given within one hour of the session ending.
- If no contact can be made with the parent by 7.00pm, the Headteacher will contact the CSSW assessment team who will arrange for a social worker to collect the child or make arrangements for the child to be transported to the CSSW office.
- The Mulberry House School annually asks parents to confirm and update contact details and to nominate an emergency contact who can collect the child in the event that they are unable to do so.
- **Where children are regularly uncollected or collected late**, this should be discussed with the designated safeguarding lead and reported to the Education Welfare Service. If there are also child protection concerns, a referral should be made to CSSW.

#### **Additional policies**

- SEND Policy



- |   |
|---|
| <ul style="list-style-type: none"><li>• EAL Policy</li><li>• Uncollected child policy</li></ul> |
|---|

## B2 Children who harm other children (peer on peer abuse)

Where a pupil's behaviour is likely to cause significant harm to other pupils, for example through bullying, cyberbullying physical violence or initiation rites, the school will refer the perpetrator and the victim to the Child and Family Contact team under the *Children who harm other children* protocol available at: [Policies/Guidance|Camden Safeguarding Board](#)

## B3 Prevention of radicalisation

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](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 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\\_England\\_Wales.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_England_Wales.pdf)

Where a 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 will follow the guidance set out in the CSCB guidance "Safeguarding children and young people from radicalisation and extremism" available at:

<http://www.cscb-new.co.uk/wp-content/uploads/2016/03/CSCB-guidance-on-radicalisation-and-extremism.pdf>

## B4 Mandatory reporting of Female Genital Mutilation (FGM)

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

[Multi-agency statutory guidance on female genital mutilation – Publications – GOV.UK](#)

Where a pupil makes a disclosure of FGM, the school will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the CSCB guidance available at: <http://www.cscb-new.co.uk/wp-content/uploads/2015/10/FGM-mandatory-reporting-guide-pdf>

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

## B5 Online Safety

As part of its duty to provide a safe learning environment and ensure pupils know how to remain safe online, the school will implement the recommendations of Camden's model schools e-safety policy available at: [eSafety Camden Safeguarding Children Board](#)

## B6 Looked after and previously looked after children and care leavers

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

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

## B7 Children with special educational needs or disabilities (SEND)

The school is aware that children with special educational needs or disabilities may be more vulnerable to harm and abuse and may be more likely to experience bullying. They may also have difficulty in reporting harm or abuse due to communications difficulties and professionals may miss vital indicators.

School policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help.

## B8 Safeguarding vulnerable groups

The school is aware that some pupils may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, CSSW or other agencies in order to overcome problems or keep them safe.

The school will adhere to the following policies in order to respond to the needs of these vulnerable groups.

### **Children at risk of forced marriage**

*Forced marriage – Detailed guidance – GOV.UK*

### **Domestic abuse and/or sexual violence**

<https://www.cscb-new.co.uk/wp-content/uploads/2017/07/CSCB-domestic-abuse-guidance.pdf>

*Schools can refer young people affected by domestic or sexual violence to the specialist worker based in the Camden Safety Net on **0207 974 1864** for advice and support.*

### **Privately fostered children**

[https://cscb-new.co.uk/?page\\_id=8261](https://cscb-new.co.uk/?page_id=8261)

*Schools have a legal duty to notify Camden of any pupil they know to be privately fostered. Schools should contact the Fostering team on **0207 974 6783** to notify Camden of any private fostering arrangements that come to their notice.*

### **Young carers**

[https://cscb-new.co.uk/?page\\_id=8264](https://cscb-new.co.uk/?page_id=8264)

*If schools have concerns about a pupil they believe to be a young carer, they can contact Family Action on **0207 272 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](http://www.family-action.org.uk)*

## **B9 Contextual safeguarding for young people**

The school 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, ay school or from their own peer group.

The school will adhere to the following policies whenever there are concerns that the young people are at risk from any of these issues:

- **Children at risk of sexual exploitation**
- **Young people at risk from gang activity or serious youth violence**
- **Modern slavery and trafficked children**
- **Children who run away/go missing**

## **11 Safeguarding vulnerable groups**

*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 FSSW or other agencies in order to overcome problems or keep them safe. Further information*

### **Children at risk of sexual exploitation**

[Child Sexual Exploitation | Camden Safeguarding Children Board](#)

### **Children at risk of female genital mutilation (FGM)**

If you think a girl is at risk of FGM you **must** report it immediately as you would any other form of child abuse. You must inform the school's Designated Child Protection Officer and a referral must be completed to children's social care. It is essential that the referral is not discussed with the child's family before it is made.

[Female genital mutilation: guidelines to protect children and women - Publications - GOV.UK](#)

### **Children at risk of forced marriage**

*Forced marriage - Detailed guidance - GOV.UK*

### **Children who run away/go missing**

[Policies / Guidance | Camden Safeguarding Children Board](#)

*Staff should also be aware that a child 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.*

### **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](#) Mulberry House School staff members can refer to the Young Person's Advocate based in the Youth Offending Service on **020 7974 6174** for advice.*

### **Trafficked children**

[Child Trafficking | Camden Safeguarding Children Board](#)

### **Privately fostered children**

*The school has a legal duty to notify Camden of any pupil we know to be privately fostered. The school 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.*

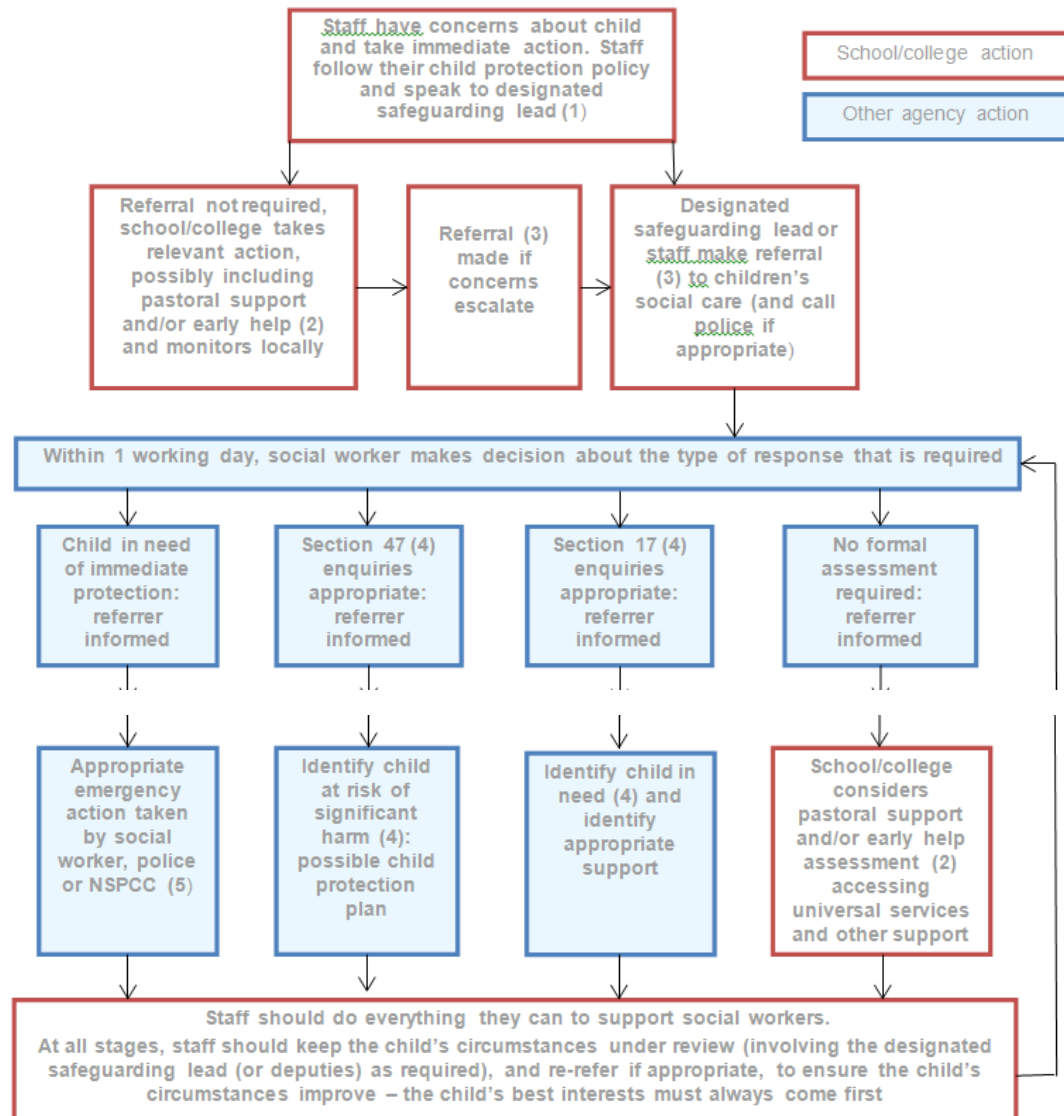
[www.family-action.org.uk](http://www.family-action.org.uk)

### **Young people at risk of violent extremism**

*Staff need to be aware of any pupils who may be in contact with or being targeted by violent extremists. Staff should refer to section 4.10 of this policy for information on what action to take to refer the young person to Camden's Channel Panel where there is evidence that a pupil is becoming deeply enmeshed in the extremist narrative. Staff can also seek advice from the Police Prevent Engagement Officer (Gareth Tuck, [gareth.tuck@met.pnn.police.uk](mailto:gareth.tuck@met.pnn.police.uk) or call 07818 587 396) and Camden's Prevent co-ordinator (Manisha Bhikha, [manisha.bhikha@camden.gov.uk](mailto:manisha.bhikha@camden.gov.uk) or call 020 7974 1475).*

## Appendix 1:

### Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO). |

## CHILD PROTECTION; DEFINITIONS AND INDICATORS

### Definitions

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, FSSW 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:

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

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

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

**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. It involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 48).

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

We recognise specifically the particular vulnerabilities of children with SEN/D to abuse. Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and we recognise that additional barriers can exist when recognising abuse and neglect in this group of children.



**This can include:**

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

**Possible indicators of abuse and neglect**

<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Inadequate or inappropriate clothing</li> <li>• Appears underweight and unwell and seems constantly hungry</li> <li>• Failure to thrive physically and appears tired and listless</li> <li>• Dirty or unhygienic appearance</li> <li>• Frequent unexplained absences from school</li> <li>• Lack of parental supervision</li> </ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"> <li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>• High frequency of injuries</li> <li>• Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"> <li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</li> <li>• Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li> <li>• Continual, inappropriate or excessive masturbation</li> <li>• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>• Unwillingness to undress for sports</li> </ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"> <li>• Developmental delay</li> <li>• Attachment difficulties with parents and others</li> <li>• Withdrawal and low self-esteem</li> </ul>
<b>Indirect indicators of abuse and neglect</b>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Withdrawal and low self-esteem</li> <li>• Eating disorders</li> <li>• Aggressive behaviour towards others</li> <li>• Sudden unexplained absences from school</li> <li>• Drug/alcohol misuse</li> <li>• Running away/going missing</li> </ul>
<b>Parental attributes</b>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> <li>• Domestic violence</li> <li>• Avoiding contact with The Mulberry House School and other professionals</li> </ul>

Appendix 2:

**Safeguarding children monitoring/incident relating to a child recording form**

**Name of child:**

**DOB:**

**Status:**  monitoring due to concerns  subject to child protection plan

Concerns/risks
Attendance and punctuality:
Periods of exclusion (including dates)
Describe contact with parents/family
Child's health and physical appearance
Behaviour and emotional presentation (including any sexualised behaviour)
Concerning incidents
Describe peer relationships
Level of academic performance and achievement
Views of child and parents
<b>Outcomes of monitoring</b> <input type="checkbox"/> continue monitoring <input type="checkbox"/> carry out CAF <input type="checkbox"/> referral to FSSW <input type="checkbox"/> referral to health services <input type="checkbox"/> referral for education support services <input type="checkbox"/> referral for behavioural support <input type="checkbox"/> referral on behalf of parent/carer
<b>Action taken</b>  Name of staff member: Signed by Lead for Safeguarding  Date:



## Appendix 3:

### The Mulberry House School Central Record

#### Important notes

This record should include:

- All staff, including supply staff and teacher trainees on salaried routes, who work in school
- All others who work in regular contact children in school, including volunteers
- For independent schools, including academies, free schools, all members of the proprietorial body

#### Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

#### Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.
- Existing volunteers who provide personal care, The Mulberry House Schools should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a The Mulberry House School can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgement made about the need for an enhanced DBS check.
- Supervision of volunteers – there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children.

#### Regulated activity

Regulated activity (see p17 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined (p17) is considered regulated activity if done regularly; where this is the case an enhanced DBS check is needed with a barred list check.

#### Contractors

Contractors or employees of contractors working at The Mulberry House School should have the appropriate level of DBS check if a check is required, e.g. if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

#### Documents

Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retained any longer than six months. Other documents to verify identity, right to work in the UK etc., should be kept in personnel files

## The Mulberry House School Central Record

	name	D O B	Address	Start Date	Job Title	EYFS/ KS1	Qualifi- cations	Date Child Protection Last Trained	Date First Aid Last Trained if applicable	QTS Teacher Ref number :	DBS	Barr ed /List 99	Overs eas police check	Eligibility to work in the UK/ Work permit	Refs	Applica tion form/ CV	Medical Fitness	Code of Conduct form signed	Prohibiti on List checked Teaching and manage ment
Check																			
Name of Checker																			
Date of Check																			
Check																			
Name of Checker																			
Date of Check																			

## Appendix 4:

All Mulberry House School policies are always to be read and considered in conjunction with Equal Opportunities, Race Equality and Inclusion policies.

# THE MULBERRY HOUSE SCHOOL SAFER RECRUITMENT POLICY

This Policy of Mulberry House School applies to all sections of the school including the **Early Years Foundation Stage**.

This policy is written in accordance with the DfE guidance 'Keeping Children safe in Education' September 2018, Working together to Safeguard Children 2018, The Equality Act 2010 and the SEND code of Practice 2014.

### Training

All least one member of staff involved in the recruitment process will hold a certificate in 'Safer Recruitment' issued by Camden.

It is the School's policy that the Headteacher is responsible for recruitment in conjunction with the Proprietor and Senior Leadership Team.

### Equal Opportunities

The school complies with the Equality Act 2010 with particular regard to those persons with protected characteristics. The School is committed to applying its equal opportunities policy at all stages of recruitment and selection. The School aims to ensure that all adverts are non-discriminatory on the basis of sex, race, colour, national or ethnic origin, religious or similar philosophical belief, marital status, sexual orientation, disability, gender reassignment, political convictions, membership or non-membership of a Trade Union, age, pregnancy and maternity or "spent convictions of ex-offenders", either in working or intent.

Any candidate with a disability will not be excluded unless it is clear that the candidate does not meet the minimum criteria outlined in the job specification. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of his/her disability.

**All academic qualifications should be listed as "or equivalent" so that they are not limited to people who have taken British qualifications only.**

- 1. Identification of a vacancy**
- 2. Advertisement of a position**

The advert will specify:

- The position
- A brief description of the school

- The school's commitment to safer recruitment
- The closing date for applications
- The application process
- The School requires all applicants to undergo an enhanced DBS check
- Application forms will only be accepted.

It is the School's policy that most internal vacancies will be posted on staffroom notice-boards in each School, unless a subject specialist is required. Existing employees are to be encouraged to apply for vacant posts if they have the appropriate qualifications, experience and skills.

The Headteacher will decide whether it is appropriate to post the vacancy also in a newspaper/jobcentre or place it with an approved employment agency.

Relevant qualification and experience will be listed on the job advertisement.

The School aims at all times to recruit the person who is most suited to the particular job. Recruitment will be solely on the basis of the applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, experience and skills will be assessed at the level that is relevant to the job.

Those wishing to apply for the position are asked to request a job description for and a job specification. The job description will describe the duties, responsibilities and level of seniority associated with the post, whilst the employee specification will describe the type of qualification(s), training, knowledge, experience, skills, aptitudes and competencies required for effective performance of the job. Application forms will only be accepted to ensure there are no gaps in work history.

Candidates will be asked not to leave any gaps in their application and to include full time or part time education or training and any periods of unemployment and periods for raising a family.

### **Pre Interview Checks**

Those shortlisted for interview will need to provide two named referees. References must be sought pre interview. One referee must be the present or most current employer. Candidates will be informed that the school reserves the right to approach any of their previous employers for a reference. If their last post did not include working with children, a reference will be sought from the employer by whom they were most recently employed to work with children.

Candidates will also be required to bring in proof of qualifications, address, identification and right to work in the UK at interview (originals must be seen).

All applicants should be asked whether they have any special requirements, either due to disability or otherwise, on being invited to interview and any reasonable adjustments made.

## **Interview**

Any request for Job Share or part time working should be considered, if suitable for the position.

When conducting recruitment interviews the Headteacher will ensure that the questions they ask job applicants are not in any way discriminatory or unnecessarily intrusive. The interview will focus on the needs of the job and skills needed to perform it effectively. A record of every recruitment interview will be made and passed to the Headteacher's PA where it will be retained for six months. On no account should any job offer be made during or at the end of an interview.

Two senior members of staff will conduct the interviews, one of whom will be the Headteacher. This is to ensure that the best person for the position is selected solely on the basis of suitability and ability. Notes are taken to record responses to interview questions.

Any selection methods used, e.g. psychometric tests, aptitude tests, should be considered with regard to relevance and as to whether they could cause indirect discrimination.

Interview candidates will be given a tour of the classes and/ or whole school.

Teachers are required to teach a lesson and write a short report

Early Years Practitioners are required to teach a lesson and read a story.

## **Job Offer**

After successful interview, the Headteacher will first telephone the successful candidate to verbally offer the position and the salary.

Upon verbal acceptance by the candidate, the School will write confirming the offer, salary agreed, and start date. The School will produce a contract of employment. The employee must sign and return both copies. It is the School's policy that the successful applicant will be asked to fill in a pre-employment medical questionnaire and the following checks will be carried out.

- A list 99 check will be carried out the day before starting
- a barred list check from a regulated activity
- a prohibition from teaching
- if applicable Prohibition from management
- an enhanced DBS check;
- Right to work in the UK
- For overseas applicants, further checks from their country of origin (police good conduct letter) verification of qualifications
- a check of professional qualifications;
- a check to establish the person's right to work in the United Kingdom. This will be applicable to anyone who has spent more than six months living outside the UK as an adult or any non UK

national. Any offer of employment will be conditional on outcome of these.

- Should there be a delay in DBS clearance, there **must** be a Risk assessment will be carried out for the period that the DBS is outstanding. The employee must not have unsupervised access to children at any time.

### **Probationary Period**

All newly appointed members of staff will be subject to an initial probationary period of 4 months, during which regular progress appraisals will be held with the Headteacher.

During the period of induction the employee must adhere to and demonstrate compliance with all school policies. Training and guidance will be given throughout. The welfare and safety of children must be clearly understood and promoted at all times.

At the end of the probationary period, the Headteacher, together with the employee's team leader and senior teacher, will make a decision on the suitability to continue.

## Appendix 4.1:

All Mulberry House School policies are always to be read and considered in conjunction with Equal Opportunities, Race Equality and Inclusion policies.

# THE MULBERRY HOUSE SCHOOL CHILD PROTECTION SAFEGUARDS FOR NEW STAFF

This Policy of Mulberry House School applies to all sections of the school including the Early Years Foundation Stage.

An enhanced DBS check and references are applied for before you commence work at The Mulberry House School. However, it is possible, due to the delays that sometimes occur before the DBS check and references are received, that at the discretion of the Headteacher, you may be asked to start work before receipt of the DBS check/ both references.

In this situation, we undertake a check of The Barred List (List 99). Prohibition from teaching and if applicable prohibition from management.

Whilst we are waiting for the DBS check to be received, senior management will enforce and check on the following procedures:

1. You should ensure that you are never in a room alone with children.
2. You should never change nappies or assist with toileting.
3. Ensure you have read the Child Protection (Safeguarding) Policy enclosed with your staff welcome pack.
4. Make yourself known to the teachers holding responsibility for Child Protection (Safeguarding).
5. A risk assessment will be carried out for your time without DBS check results/ references. You will be asked to sign this.
6. You have read and signed the Staff Code of Conduct.

The situation is reviewed every 2 weeks.

.....

I have read and will adhere to Child Protection Safeguards for New Staff Policy

New staff member:

Name.....

Date.....

Signature.....

All Mulberry House School policies are always to be read and considered in conjunction with Equal Opportunities, Race Equality and Inclusion policies.

## Appendix 4.2:

# **THE MULBERRY HOUSE SCHOOL RECRUITMENT: POLICY ON RECRUITMENT OF EX-OFFENDERS**

This Policy of Mulberry House School applies to all sections of the school including the Early Years Foundation Stage.

The aim of this policy is to state Mulberry House School's ('the School') approach towards employing people who have criminal convictions.

The School will not unfairly discriminate against any applicant for employment on the basis of a conviction or other information revealed. As an organisation using the Disclosure and Barring Service ('DBS') to assess applicants' suitability, the School complies fully with the DBS Code of Practice and is fully committed to equality of opportunity for all job applicants and staff regardless of race, nationality, ethnic or national origin, gender, gender reassignment, religion or religious belief, sexual orientation, marital or civil partner status, age, disability or offending background. The School aims to select people for employment on the basis of their individual skills, abilities, experience, knowledge and, where appropriate, qualifications and training.

The School will therefore consider each ex-offenders application for employment on their individual merits in accordance with the objective criteria contained in this policy.

### **1. The Rehabilitation of Offenders Act 1974 ('the Act')**

The Act primarily exists to support the rehabilitation into employment of reformed offenders. Under the Act, following a specified period of time, cautions and convictions may become spent. Once a caution or conviction has become spent under the Act, a job applicant may not have to reveal it or admit its existence unless an exception applies (see section 2 below).

#### **Jobs that are exempt from the Act**

All positions within the School are exempt from the provisions of the Act. All applicants must therefore declare all previous convictions, including those which would normally be considered "spent" when applying for a position at the School (except those to which the DBS filtering rules apply – see Appendix 1). Even in these circumstances, however, the School will not refuse to employ a particular individual unless the nature of the conviction has some relevance to the job for which the



individual has applied or it is unlawful for the School to employ that individual i.e. because they are barred from working with children.

A failure to disclose a previous conviction may lead to an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence. It is a criminal offence for any person who is barred from working with children to attempt to apply for a position at the School.

The School will make a report to the DBS (and police, where appropriate) if:

- We receive an application from a barred person (DBS or Prohibition List)
- We are provided with false information in, or in support of, an applicant's application
- We have serious concerns about an applicant's suitability to work with children.

The School is committed to ensuring that all information provided about an individual's criminal convictions, including any information released in disclosures, is used fairly and stored and handled appropriately and in accordance with the provisions of the Data Protection Act 1998. Data held on file about an individual's criminal convictions will be held only as long as it is required for employment purposes and will not be disclosed to any unauthorised person.

## 2. Procedure

We select all candidates for interview based on their skills, qualification and experience. All applicants called for interview are encouraged to provide details of their criminal record at an early stage in the application process. We request that this information is sent under separate, confidential, cover to a Victoria Playford within the School and we guarantee that this information is only seen by those who need to see it as part of the recruitment process.

All application forms, job adverts and recruitment briefs will contain a statement that a Disclosure will be requested in the event of the individual being offered the position. Due to the nature of the work, the School requires an **enhanced** disclosure from the DBS in respect of all prospective staff members, including volunteers and the Proprietor.

We ensure that all those in the School who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Act.

At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.

We make every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice. This is available on the DBS's website, [www.homeoffice.gov.uk/agencies-publicbodies/dbs](http://www.homeoffice.gov.uk/agencies-publicbodies/dbs).

We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment.

**Having a criminal record will not necessarily bar an applicant from working with us.** In the event that relevant information (whether in relation to a previous conviction or otherwise) is volunteered by the applicant during the recruitment process or obtained through a DBS check, the School will consider a number of factors before reaching a recruitment decision. These include the nature of the position applied for; the circumstances and background of the offences and whether it is relevant to the position in question; the length of time since the offence occurred; any pattern of offending behaviour and explanation offered by the applicant. The School may carry out a risk assessment by reference to such criteria before reaching a decision.

## Appendix 5:

All Mulberry House School Policies are always to be read and considered in conjunction with Equal Opportunities, Race Equality and Inclusion Policies

# THE MULBERRY HOUSE SCHOOL INTIMATE CARE POLICY AND NAPPY CHANGING PROCEDURE

This Policy of Mulberry House School applies to all sections of the school including the Early Years Foundation Stage.

*To be read in conjunction with Staff Code of Conduct Policy.*

### **Aim:**

At Mulberry House School we aim to meet the needs of all our children and promote their welfare. We recognise and assist children with intimate care where needed, and ensure that the children are treated with courtesy, dignity, and respect at all times.

Parents, children and all stakeholders are entitled to expect the highest standards of conduct from all our staff, and it is regarded as an essential part of the warm welcoming ethos of this school.

It is the responsibility of all staff to maintain the highest standards of hygiene and support young children in developing good personal hygiene habits.

- **Only members of staff who have who DBS clearance may provide a child with personal care or escort children to the lavatory.**
- Where possible children are encouraged to be as independent as possible when using the lavatory, i.e. children are encouraged to undress and dress independently, wash hands with soap and water after using the facilities.
- We value our partnership with parents and will work with them as part of the 2 Year Progress check with regards to their child's readiness to be toilet trained.
- Assistance may be required with wiping and cleaning of a very young child or a child with additional needs. In these instances staff should offer the child support if necessary ensuring that the child's personal space is respected at all times.
- Where practical a second member of staff can be in the vicinity of the changing area. Staff should notify colleagues of what they have done and why. A written log is kept of nappies changed and children changed as a result of wetting or soiling (team communication book)

- Staff who are assisting children with personal care/ changing clothes should wear disposable gloves and a disposable apron.
- Children who need intimate care must have their privacy respected.
- The Mulberry House School is committed to providing staff with the appropriate training in lifting and handling children and equipment. All staff are given manual handling training as part of their induction and are aware that lifting and handling is part of their daily duties.
- Parents are notified, as part of their welcome to the school, to provide spare clothes each day in case of accidental wetting or soiling.
- When incidents occur which involves children wetting or soiling the flooring or equipment, additional members of staff are available to clean and disinfect the area. Parents should be informed of how their child was cared for.
- There are designated toilet areas where children can be cared for. These are private and easy to clean.
- If a child requires specific assistance with intimate care, staff meet with the parents to discuss the child's needs and devise an agreed intimate / personal care plan. We monitor and review the plan on a regular basis.

This policy has been written in accordance with the Disability Discrimination Act (amended 2005).

## **Nappy Changing Procedure**

**This Policy of Mulberry House School applies to all sections of the school including the Early Years Foundation Stage.**

No child is excluded from participating in the nursery who may, for any reason, not yet be toilet trained and who may still be wearing nappies or equivalent. Work is carried out with parents towards toilet training, unless there are medical or other developmental reasons why this may not be appropriate at the time.

Any necessary adjustments are made to our bathroom provision and hygiene practice in order to accommodate children who are not yet toilet trained.

Toilet training is seen as a self-care skill that children have the opportunity to learn with the full support and non-judgemental concern of adults.

These procedures are written in line with current guidance Early Years Foundation Stage – (EYFS).

### **Procedure:**

- It is our intention that the key person changes a child's nappies. However, where this is not possible a buddy key person will do so.
- Each child's school bag, which contain nappies and nappy wipes, is taken into the nappy room.
- Staff always wear disposable gloves and a plastic apron when changing a nappy.

- Each child's bottom is cleaned using water and cotton wool or baby wipes. Always clean from front to back, especially for girls, to avoid transferring bacteria to the genitals.
- Each child is changed at least once during the morning and afternoon session whether they have a soiled nappy or not and again if necessary.
- A child is never left unattended in the changing room.
- The toilet is introduced when agreed through discussion between practitioner and parent.
- Soiled nappies must go into a bag before putting them into the nappy container.
- Children in their second term will start to use the toilet before each nappy change after consultation with parents.
- At the end of each session the nappy container is emptied and the contents put into a black bin liner and put outside into the dustbin shed.
- After each session the nappy mat and surrounding area is cleaned with Dettol.
- Staff should always wash their hands after each change.
- The door to the changing area should be kept shut when not in use.
- Over the counter nappy cream is only administered in severe cases with written permission from parents. If a child requires nappy cream a form will need to be completed with the Medical Carer and is then stored in the child's file.

### **Disseminating and Implementing this Policy**

All nursery staff will be required to read this policy on their induction and to comply with the contents of the policy. The policy will be kept in the staffroom and will be available for staff to refer to at all times.

The implementation of the policy will be monitored by senior staff on a day to day basis.

Any adverse incidents will be recorded and reviewed to ensure the policy is fit for purpose.

The policy will be formally reviewed at least every two years.

## **Appendix 6:**

**All Mulberry House School policies are always to be read and considered in conjunction with Equal Opportunities, Race Equality and Inclusion policies.**

# **THE MULBERRY HOUSE SCHOOL WHISTLE BLOWING POLICY**

**This Policy of Mulberry House School applies to all sections of the school including the Early Years Foundation Stage.**

The Public Interest Disclosure Act (PIDA) 1998, commonly called the Whistle-blowing Act, provides protection for workers who disclose information on wrong doing at work which might otherwise be seen as confidential.

The Public Interest Disclosure Act 1998, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. However, where an individual discovers information which is believed to show malpractice or wrong doing within the school, then this information should be disclosed without fear of reprisal and may be made independently of line management.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. Inappropriate behaviour displayed by other members of staff, or any other person working with the children must be reported, for example, inappropriate comments sexual or otherwise; excessive one – to –one attention beyond the requirements of their usual role and responsibilities; overfamiliarity with parents and or children, both in and out of school and via social media or sharing of children's images, inappropriate or otherwise.

It is not designed for the questioning of financial or business decisions taken by the school; nor may it be used to reconsider any matters which have already been addressed under harassment, complaint or disciplinary procedures. Once it is in place, it is reasonable to expect staff to use it rather than to air their complaints outside the nursery. As the person blowing the whistle you will not necessarily be directly affected by the danger or illegibility. This is different from a complaint or grievance. If you make a complaint or lodge a grievance, you are saying that you personally have been poorly treated.

The school will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required. This policy

encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the school.

### **Procedures for Making a Disclosure**

The individual should make the disclosure to the Headteacher/or any member of the Senior Leadership team.

The Headteacher will consider the information made available to them and decide on the form of investigation to be undertaken. Normally this decision will take into account the views of at least one other member of staff. The decision may be to investigate the matter internally, with consent from the Proprietor and to refer the matter to the police. The LADO, Ofsted or ISI can and should be notified in cases where there is an allegation of abuse against a member of staff.

As a result of this, investigation other internal procedures may be invoked, such as: Disciplinary, grievance or complaints, harassment, or it might form the basis of a special investigation. Investigations should not be carried out by the person who will have to reach a decision on the matter. Any investigation will be conducted as sensitively and speedily as possible.

In some instances it might be necessary to refer the matter to an external authority for further investigation, in particular, in cases alleging fraud.

The Headteacher will inform the individual making the disclosure what action, if any, is to be taken. If no action is to be taken then the individual concerned should be informed of the reason for this and allowed the opportunity to remake the disclosure to another appropriate person/proprietor/Ofsted/ISI.

The person or persons against whom a disclosure is made will be told of it, the evidence supporting it and will be allowed to comment before any investigation is concluded or further action commenced.

A report of all disclosures and any subsequent actions taken will be made by the designated person who will retain such reports for a specified period of time.

If your concern is about the Headteacher you must notify the proprietor immediately and must contact Ofsted's Whistle Blowing Hotline on 0300 123 3155. The hotline can also be used if you feel you need to take your concerns to someone outside the school.

Staff can also use the Camden helpline on 0800 734 199. They can contact Camden's Child Protection Co-ordinator on 020 7974 6999 if there are concerns about a specific child.

## Appendix 7:

All Mulberry House School Policies are always to be read and considered in conjunction with Equal Opportunities, Race Equality and Inclusion Policies

# THE MULBERRY HOUSE SCHOOL PROCEDURE FOR THE MANAGEMENT OF AN ALLEGATION OF ABUSE MADE AGAINST:

- **A member of staff**
- **Headteacher**
- **Proprietor**
- **Volunteer**
- **Contractor**

By this we mean allegations of serious harm or abuse by any person living, working or looking after children in our schools (whether that allegation relates to harm or abuse committed on our premises or elsewhere) or of any other abuse which is alleged to have taken place on the premises or elsewhere. Allegations must be reported immediately.

In the absence of the Head, the allegation should be passed to the Proprietor (Bethan Lewis-Powell) and Deputy Designated safeguarding Lead (Teresa Ferrari). The Head will always be kept informed of any allegations against staff or volunteers working at their respective site. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Proprietor (Bethan Lewis-Powell) and Deputy Designated safeguarding Lead (Teresa Ferrari) without notifying the Head first.

The purpose of this document is to assist the Headteacher and/ or Proprietor in managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work with children. The Proprietor has a duty of care to employees. While deciding what steps should be taken when an allegation is made against a member of staff and at the same time considering child protection issues and any appropriate staff disciplinary action.

There are restrictions on the reporting or publishing of allegations against staff and the School will take all reasonable steps to ensure that confidentiality is maintained and guard against unwanted publicity while an allegation is being investigated. These restrictions apply up to the point where the accused is charged with an offence, or the DfE/NCTL publish information about an investigation or decision in a disciplinary case.

This document cannot cover every eventuality. The Headteacher must assess each allegation in the light of these procedural guidelines and obtain support and advice from Camden Local Authority Designated Child Protection Officer LADO, as to the most appropriate way of proceeding within one working day.

The following definitions are used when determining the outcome of the allegation investigation.

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.



- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore does not imply guilt or innocence.

### **Initial action by Headteacher**

- Make sure the child is safe and decide whether any immediate medical attention is needed.
- Make a written record of the allegation made against the member of staff.
- Gather relevant information and check practical details, i.e.
  - Were there any witnesses
  - When and where the incident occurred
  - Were the member of staff and child(ren) in contact on the day of the alleged incident
- **DO NOT INTERVIEW THE MEMBER OF STAFF OR ANY OF THE WITNESSES AT THIS POINT.**
- Keep an open mind and allow for the possibility of an allegation having some substance to it.
- Phone the LADO for Child Protection on 0207 974 6999 to consider whether there is sufficient substance in the allegation to warrant a formal child protection investigation or an informal school investigation.
- Inform OFSTED of the above (via ISI Office), as soon as is reasonably practicable, but at the latest within 14 days.
- Inform the proprietor of the school.

Primary responsibility for the protection of children rests with local authority Social Services departments and the Police. The NSPCC also has powers to act. Any child protection investigation will need to be led by these agencies and advice will be given on any further information gathering that the Headteacher may be asked to collect and which will not interfere with possible evidence where legal action may be pursued.

Camden Local Education Authority, together with the Headteacher, has a duty under the Children Act 1989 and should comply with 'Working Together to Safeguard Children' (2010) to work together with other agencies to safeguard children and to share relevant information to this end. It is important to remember that one of the key principles of the Children Act provides for the child's welfare to be the paramount consideration. If there are concerns about abuse, action must be taken to stop it and to prevent further abuse.

### **Consideration of Child Protection when an allegation is made**

The Department of Health document 'Working Together to Safeguard Children' (2015) describes each type as follows:

#### 1. Physical

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

#### 2. Emotional

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

### 3. Sexual

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### 4. Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

### 5. Complex and organised

Complex and organised abuse may be defined as abuse involving one or more abusers and a number of related or non-related abused children and may take place in any setting. The adults concerned may be acting in concert to abuse children, sometimes acting in isolation or may be using an institutional framework or position of authority such as a teacher, coach, faith group leader or be in a celebrity position to access and recruit children for abuse.

Such abuse can occur both as part of a network of abuse across a family or community and within institutions such as residential settings, boarding schools, in day care and in other provisions such as youth services, sports clubs, faith groups and voluntary groups. There will be cases of children being abused via the use of electronic devices, such as mobile phones, computers, games, consoles etcetera which all access the internet and in particular social networking websites.

Although in most cases of complex and organised abuse the abuser(s) is an adult, it is also possible for children / young people to be in the perpetrators of such harm, with or without adult abusers.

The Camden Child Protection Policy offers definitions of these forms of abuse alongside 'Working Together' and complies with the All London Child Protection Procedures.

Responding to and managing allegations against staff is a demanding task. It is necessary to be sensitive to the child's needs and family distress while also having regard for the stress and the rights of the member of staff involved.

### **Procedure for School Action**

**Members of Staff** receiving an allegation from a child or parent/carer should:

- Report to the Headteacher immediately or to the Senior Teacher if the Headteacher is not available.
- Failure to report, in accordance with procedures, could be a potential disciplinary matter. This is in line with the statutory responsibility placed on teaching staff from September 2014 under the Education Bill.

**All Staff** should:

- Act quickly even if it is not obvious that the child has suffered significant harm.
- Not interfere with evidence, e.g. interviewing child(ren).
- Not investigate the allegation.
- Note that the Police have a duty to investigate criminal offences against children.
- Not interview or discuss the allegation with the member of staff concerned.

### **Where the allegation has been made against the Headteacher**

- Report to the Proprietor
- Report to the Child Protection Officer if the allegation is against the Headteacher.
- Report to OFSTED via the Whistle-blowing Hotline (0300 123 3155)

***Schools and other educational establishments have a pastoral duty of care to the pupils they are entrusted with. A failure to refer a significant concern about a child could be a breach of that child's human rights (Article 3 – protection from inhuman or degrading treatment).***

**The Headteacher** should:

- Obtain written details of the allegation signed and dated by the person receiving the allegation (not the child).
- Record times, dates, location and names of potential witnesses.
- Consult with the LEA Designated Officer for child protection. You may be asked to obtain a written account of the alleged incident from the member of staff involved.

***Early action to establish the nature of the allegation and whether it should be investigated should not prejudice subsequent action (there must be no interference with evidence).***

Establishing whether the allegation needs investigating is different to deciding whether it is unfounded.

***It is not helpful or desirable for all allegations to be processed through the child protection system, unless there is clear cause for this.***

**The Headteacher** should not consider the need for disciplinary action if wholly satisfied that:

- The child(ren) is/are not at risk of significant harm.
- A reportable offence has not been committed.

### **Outcome of Initial Consideration**

Where the Headteacher considers that the allegation is clearly:

- Reasonable force to restrain pupil (in accordance with guidance), or,
- Demonstrably false (without foundation) agreed by the Headteacher, e.g. immediate circumstances show incident was not possible, or,
- Inappropriate staff behaviour/poor practice which does not meet the threshold for child protection and referral, or,
- An incident considered to be trivial, i.e. member of staff telling a child to do something within the normal day to day duties.

***No referral to Social Services or the Police will be necessary under these procedures. The Headteacher and Senior teacher will be available to discuss any outstanding issues with parents/carers if required to do so.***

It may be, however, that the child is deemed to be in need and a referral to Social Services may be made on this basis. Please refer to the LEA Child Protection Policy (The Children in Need Continuum).

We will ensure that everyone within our school establishment recognise our duties not only to children at risk of significant harm, but also to children in need. It is not necessary for schools to use the legal phrase “child in need”; to show an understanding that our role includes recognising when a child needs support, preventing problems escalating and working with external agencies to this end if that is what is called for.

Where our concerns involve safeguarding children at risk (who have suffered or are likely to suffer significant harm), those concerns will be reported to the Designated Safeguarding Lead (Victoria Playford) and then Children’s Social Care immediately if no crime has been committed otherwise it will be reported directly to the police. Where we identify those children who are in need of additional support we will refer this to the Designated Safeguarding Lead (Victoria Playford), then we will refer this to Children’s Social Care and seek inter-agency assessment, including use of the “Common Assessment Framework (CAF)” and “Team around the Child” (TAC) approaches and the Multi-Agency Safeguarding Hub (MASH) who provides a single point of access to early help and safeguarding services.

***Where the Headteacher considers that a child has suffered significant harm or is at risk of suffering, a referral must be made to Social Services Duty and Assessment Team 0207 974 6666.***

Where sexual abuse or physical injury is not suspected, the Headteacher will decide whether it is safe for the child to be in contact with the member of staff.

The Headteacher, having ensured that the child is safe and reassured, should seek advice from Social Services about the need for a medical examination, particularly in cases of physical injury and/or sexual abuse.

A decision will have to be made during the referral to Social Services as to who will inform the child's parents/carers. Usually this would be the Headteacher.

## **Involving the wider professional network**

### **Strategy Meetings**

If concerns about an allegation are considered to be of sufficient concern Social Services will convene a Strategy Meeting. This is a professionals meeting to establish whether a criminal act has occurred and the need for a Police/Social Services investigation under S.47 Children Act '89.

The Headteacher/Designated Teacher for Child Protection or Nominated Governor (if the allegation is made against the Headteacher), Social Worker and Manager and an officer from the Police Child Protection Team will be invited to attend the Strategy meeting as soon as possible after the referral has been made.

***The Headteacher/Designated Teacher for Child Protection will need to bring basic details of the member of staff who is the subject of the allegation as well as details of the child involved and any witnesses, i.e. names, dates of birth and addresses.***

Personnel will check on the member of staff details and the date of the last police check undertaken and provide this information for the strategy meeting.

The Headteacher/Designated Teacher for Child Protection will also be required to share any previous concerns relating to the member of staff under discussion.

Where the allegation is made against a supply teacher the teacher employing agency would be invited to the strategy meeting.

If an allegation is made against a student/beginner teacher who is not directly employed by the school, it is the responsibility of the student's college to participate in the decisions made at the strategy meeting.

Sometimes the information shared at the strategy meeting makes it clear that there is insufficient evidence (one person's word against another's, with no witnesses or medical evidence). Parents/carers can be notified that due consideration was given to the facts known but that no further action can be taken due to the lack of evidence. This will usually be done by Social Services.

It is often helpful to parents/carers to know that the allegation has been discussed with the wider professional network and can enable them to come to terms with the situation and put the matter behind them.

There is a possible risk that parents/carers may be harbouring thoughts about possible collusion or defensiveness which then affects their relationship with the school if concerns of inappropriate behaviour or abuse is not reported.

## **Suspension of staff following an allegation being made**

If the allegation made against the member of staff clearly constitutes gross misconduct, i.e. serious physical or sexual injury to a child/young person, immediate suspension will be necessary.

Decisions about whether the member of staff is to be suspended can be discussed at the strategy meeting and the responsibility for this ultimately lies with the Headteacher. Consideration is also given as to who will tell the member of staff of the allegation and to provide appropriate support throughout the process of any ensuing investigation.

**The Headteacher** should consider the following:

- Whether the member of staff is to be moved from class contact with the child.
- Timetable re-arrangements might be appropriate until the strategy meeting has taken place and a clearer course of action agreed.
- The member of staff must not be in a position where they can influence the child in any way.
- The need for confidentiality to be maintained in accordance with the rights of the member of staff.

***Suspension should not be undertaken without good reason. Circumstances in which suspension would be appropriate would include:***

- Where the allegation is so serious that it potentially constitutes gross misconduct.
- Where it is necessary so that the investigation can proceed unimpeded.
- Where there are grounds for suspicion that children are at risk.
- When it could cause more difficulties for the member of staff if a number of children were involved and where there is widespread gossip or rumour.

In all cases where suspension is being considered, the Headteacher should advise the mentioned member of staff to seek assistance from their trade union or seek legal advice. In the case of supply staff from a teacher employment agency advice can be sought from the Manager there.

***Contact with the member of staff will be necessary to ensure that they are kept updated throughout the progress of investigation and to clarify any queries about the process.***

### **Police Involvement**

In some cases the Police may wish to interview the member of staff against whom the allegation has been made before an approach has been made by the Headteacher.

The Police may act independently of the school and must be given every assistance with their enquiries and confidentiality must be maintained.

It is likely that the Police interview of the member of staff will take place at Holborn Police Station and they would normally make appointments for this to be at reasonable times.

The Police can make the decision to either caution or arrest the member of staff for the purposes of the interview. This is a formality and **is not the same as being charged**. It means that the member of staff can give their version of what happened and be asked questions based on the allegation itself.

If under **arrest** the member of staff is expected to stay in the interview room until the end of the interview.

The Police may also wish to interview any witnesses. They may request permission to do this at the school if it involved other children or members of staff. Parents/carers permission will be sought and if it is in the child's best interests the interview can take place at their home.

### **Relationship between Disciplinary and Criminal Process**

The disciplinary process and criminal investigation have different objectives. They should be clearly separated and not confused.

A Police and/or child protection (S.47) investigation takes priority over internal disciplinary investigation by school and will determine whether the investigations can be carried out concurrently.

Decisions regarding the discipline process will be more fully informed by information from the Police and/or child protection investigation.

### **The Role of the Investigation and Referral Support Co-ordinator**

Have been established by the DFES, each responsible for working with and supporting a cluster of LEA's.

Play a key role in providing strategic advice and support in the education sector in areas related to child protection.

### **Where Allegations against Staff are Unsubstantiated**

Where, following enquiries, it is concluded that there is insufficient evidence to support the allegation, the Headteacher, in consultation at a Review Strategy meeting, will decide the following:

Who will inform the member of staff - This will usually be the Headteacher.

The Headteacher will formally write to the member of staff to confirm the conclusion of the multi-agency discussions and action.

Who will inform the child and his/her parents/carers of the outcome. This will usually be Social Services.

Consider the provision of support for the child and, where appropriate, the parents taking full account of the child's needs where a seemingly false allegation has been made.

Inform staff conducting disciplinary procedures that the child protection investigation has been concluded.

An unsubstantiated allegation, however, simply means that there is insufficient identifiable evidence to substantiate the allegation. This does not imply guilt or innocence.

A malicious allegation implies a deliberate act to deceive. It will be necessary to have evidence which proves this intention.

The perception that an allegation is malicious should not preclude a child protection referral being made. Social Services may need to be involved on a child in need basis.

### **Media**

Media interest can add to problems for an accused member of staff. This can be triggered by parents talking to other parents and this can hinder the investigations.

Individuals are entitled to privacy under the Human Rights Act and early contact with a solicitor for advice and support is strongly advised.

A solicitor will be briefed when circumstances arise relating to their schools to emphasise the need to avoid media coverage.

This document clarifies the process for dealing with allegations made against staff and should support staff who are allocated responsibility for managing such cases. If you are in any doubt or need further advice or support please contact/ discuss further with the Headteacher.

### **Records and Confidentiality**

It is important that accurate and objective records are kept and should include the nature of the allegation made, dates and details of who has been informed and agreed action.

The **senior designated member of staff** must ensure that any agreed action is carried out.

If any worker is concerned that their concerns have not been acted on, it is their responsibility to contact social services direct (see contact list).

### **Communicating with Parents**

As a general principle, it is important to be honest about concerns when talking to parents/carers.

It is advisable that parents/carers are informed of the referral to social services and reassured that they will be kept informed of what is going to happen.

There may be circumstances when it would not be appropriate for you to speak to the parents/carers prior to the referral to social services, i.e. suspected sexual abuse. Advice can be sought from the Duty Officer at social services to decide how this will be done and by whom.

### **Conclusion**

All staff must be aware and sensitive to equality issues and ensure that appropriate consideration is given to a child with any disability, special educational need, sexuality and gender and cultural issues.

Failure to share concerns where there are concerns about a child being abused by a member of staff is likely to result in disciplinary procedures.

It is, therefore, very important that all staff receive appropriate child protection training and are made explicitly aware of this Guidance.



## Useful Contacts

### **NSPCC**

Anonymous helpline  
0808 800 500  
[www.nspcc.org.uk](http://www.nspcc.org.uk)

### **London Women's Aid**

There is specialist resource provision for Latin-American women, Asian women, not necessarily in the local area.  
01179 444 411

### **Domestic Violence Helpline**

0808 2000 247

### **Refuge – Women's Refuge**

Network of refugees throughout London and South East England for women and children escaping domestic violence.

Helpline: 020 7395 7700

[www.refuge.org.uk](http://www.refuge.org.uk)

### **Everyman Project**

Counselling for men who want to stop their violent or abusive behaviour. Telephone helpline for anyone concerned about a man's violence.

Helpline: 0207 263 8884

### **Women's Alcohol Centre**

66a Drayton Park, N1 1ND  
0207 226 4581

### **Breaking Free Survivors – child sexual abuse**

Telephone helpline and support for women survivors of child sexual abuse.

Helpline: 07547 680 839

### **British Pregnancy Advisory Service**

Information and counselling on pregnancy issues, abortion and fertility.

Telephone: 08457 30 40 30

### **London Lesbian and Gay Switchboard**

Helpline for lesbians and gay men offering support and information.

Helpline: 0207 837 7324

### **Families Anonymous**

Families Anonymous run over 45 groups throughout the UK for families and friends of drug users.

Telephone: 0845 1200 660

### **Anti-Bullying Campaign**

0207 378 1446

### **Kidscape**

National charity teaching children how to keep safe before they become victims of abuse. (Bullying helpline, surveys, phone numbers.)

0207 730 3300

**Relate**

Provide support for marital difficulties.  
0300 100 1234

**Parentline Plus**

Support and advice for parents.  
0808 800 2222

**Men's Advice Line**

Confidential helpline for all men experiencing domestic violence.  
0808 801 0327

I have carefully read the Mulberry House School Child Protection (Safeguarding) Policy. I understand and agree to adhere to the School's guidelines. I understand that any questions are to be directed to the Headteacher and any violation of the policies will result in loss of access privileges and disciplinary action.

Name [print]: .....

Signature: .....

Date: .....