



## THE MULBERRY HOUSE SCHOOL

*All The Mulberry House School Policies are always to be read and considered in conjunction with the Whistleblowing, Safer Recruitment and Staff Code of Conduct Policies*

# **CHILD PROTECTION (SAFEGUARDING) POLICY**

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

### **Our Commitment**

The school is committed to safeguarding and promoting the welfare of children and young people and expects all staff, parents and carers to share this commitment. The school will always act in the best interests of the child and have a culture of safety, equality and protection.

### **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 that The Mulberry House School staff have the skills and knowledge to take action where children are in need of extra support from early help services or require a social work service because they are in need or need to be protected from harm. 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 2023), Relationships Education, Relationships and Sex Education (RSE) and Health Educations, What to do if you're worried a child is being abused (March 2015), Disqualification under the Childcare Act (2006), Working Together to Safeguard Children (2018) including Information sharing (2018), The use of Social Media for online-radicalisation, and the Prevent Duty Guidance: for England and Wales. In adhering to KCSIE we carry out all required Pre employment checks for all staff – see our Safer Recruitment Policy.

The school will work to the following documents in order to support the protection of pupils who are at risk of significant harm. They can be accessed through these links:

[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 Partnership Child protection procedures](#)

[Keeping Children Safe in Education 2023](#)



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

### Key Contacts

#### School

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

**The Proprietor and Directors take overall responsibility for child protection:**

**Name:** Bethan Lewis-Powell, Cari & Duncan Binet-Fauvel  
**Contact details:** 020 8452 7340 or 07534555063

**Headteacher:** Victoria Playford  
**Contact details:** 020 8452 7340

**Designated safeguarding lead (DSL), for the whole school including the EYFS:**

**Name:** Maria Adela Fojo Nebril (Senior Deputy Headteacher)  
**Contact details:** 020 8452 7340

**Deputy designated safeguarding lead (DDSL), for the whole school including the EYFS:**

**Name:** Victoria Playford (Headteacher)  
**Contact details:** 020 8452 7340

**Deputy designated safeguarding lead (DDSL) First School:**

**Name:** Hemisha Varsani (Team Leader EYFS Class)  
**Contact details:** 020 8452 7340

**Deputy designated safeguarding lead (DDSL) Second School:**

**Name:** Rebecca Hennigan (Class Teacher EYFS Class)  
**Contact details:** 020 8452 7340

#### London Borough of Camden

##### Camden Safeguarding Children Partnership (CSCP):

The Camden Safeguarding Children Partnership will be led by 3 statutory safeguarding partners who will hold equal responsibility for safeguarding children in the area. The statutory safeguarding partners are Camden Council, Camden Clinical Commissioning Group (CCG) and North Central Borough Command Unit (BCU) of the London Metropolitan Police Service. The school will operate safeguarding procedures in line with locally-agreed inter-agency procedures.



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### **Child Protection service manager:**

**Name:** Sonia Forbes  
**Contact:** 0207 974 4351

### **Local Authority Designated Officer (LADO):**

**Name:** Jacqueline Fearon  
**Contact:** 020 7974 4556  
**Email:** [LADO@camden.gov.uk](mailto:LADO@camden.gov.uk)

### **Safeguarding Lead officers:**

**Name:** Michelle O'Regan (Head of Service - Children in need)  
**Contact:** 0207 974 1905  
[Michelle.O'Regan@camden.gov.uk](mailto:Michelle.O'Regan@camden.gov.uk)

**Name:** Tracey Murphy (Service Manager)  
**Contact:** 0207 974 4103

**Name:** Patricia Williams (Service Manager)  
**Contact:** 0207 974 1558

### **Children and Family Contact Service/Multi-agency Safeguarding Hub (MASH) team:**

**Contact:** Fatima O'Dwyer  
**Tel:** 0207 974 1553/3317 (9am-5pm)  
**Out of Hours Tel:** 0207 974 4444  
**Fax:** 020 7974 3310  
**Email:** [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)  
**Secure Email:** [LBCMASHadmin@camden.gov.uk.cjsm.net](mailto:LBCMASHadmin@camden.gov.uk.cjsm.net)

### **Online safety contact officer:**

**Name:** Jenni Spencer  
**Tel:** 020 7974 2866

### **Prevent Co-ordinator/Education Manager:**

**Name:** Jane Murphy  
**Tel:** 0207 974 1008

### **Virtual School Head**

**Name:** Natalie White  
**Tel:** 0207 794 2359

### **Non-emergency advice**

**Email:** [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)  
**Tel:** 0207 340 7264

### **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.



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### **Roles and Responsibilities**

#### **Camden Supporting People Directorate/Children Safeguarding and Social Work Division (CSSW)**

The Directorate includes the Children's Safeguarding and Social Work (CSSW), Early Intervention and Prevention divisions and Camden Learning 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).
- ◆ taking responsibility for those children who are not in education, including children who are known to be home educated.

#### **The Proprietor and Directors**

- ◆ The Proprietor (Bethan Lewis-Powell) and Directors (Cari and Duncan Binet Fauvel) will ensure that the school meets its statutory duties with regard to safeguarding and protecting pupils and that processes are in place to enable staff to understand the nature of safeguarding children in education and their role and responsibilities in doing so.
- ◆ The Proprietor (Bethan Lewis-Powell) and Directors (Cari and Duncan Binet Fauvel) will ensure that they facilitate a whole school approach to safeguarding as set out in this policy. This means involving everyone in the school and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately all systems, processes and policies should operate with the best interests of the child at heart.
- ◆ In cases of investigations, the Proprietor and Directors will take overall responsibility for liaising with Camden CSSW on safeguarding and child protection matters and link with the LADO in the event of an allegation against the Headteacher.

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

- ◆ That appropriate action is taken in a timely manner to safeguard and promote children's welfare.



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- ◆ A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.
- ◆ The Proprietor (Bethan Lewis-Powell) and Directors (Cari and Duncan Binet Fauvel) will take a risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- ◆ Ensuring that the DSL and DDSs are appointed to take responsibility for safeguarding within the school on a day-to-day basis, and that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children;
- ◆ Creating an environment where staff feel supported in their safeguarding role and able to raise concerns;
- ◆ Ensuring 'practitioners' (such as those who work directly with children) have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.
- ◆ The school has the following policies in place and that these are regularly monitored, reviewed and updated where necessary:
  - ❖ Safeguarding and child protection policies and procedures covering early help assessment, low level concerns, whistleblowing, acceptable use of technologies (including use of mobile devices), online safety (including ty which, amongst other things, an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring), extra-familial harm and child on child abuse that are consistent with Camden Safeguarding Partnership procedures and Camden's internal policies, including policies on Safer recruitment, e-safety and whistle blowing procedures.
  - ❖ A staff behaviour policy (sometimes called a code of conduct). All members of staff are provided with a copy of this policy at induction and annually thereafter.
  - ❖ A behaviour and/or anti-bullying policy that includes measures to prevent bullying and harassment, including cyberbullying, prejudice based and discriminatory based bullying.
  - ❖ Ensure all staff complete a staff suitability self-declaration form to ensure they are suitable to work with children. This is then completed annually.
  - ❖ That the school does not knowingly employ people to work in childcare or allow them to be directly concerned in its management, if they themselves are directly 'disqualified' from childcare.



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- ❖ Third party checks to ensure the policy is being implemented and working in practice.
- ❖ A procedure for responding to incidents where children go missing or are absent 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', 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, Annex A and Annex B. The importance of whistle blowing is always emphasised and a copy of our whistle-blowing policy is made available. Staff are encouraged to raise issues where there are concerns about safeguarding practices at school and there are robust whistleblowing procedures in place.
- ◆ Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy and annually thereafter.
- ◆ The Proprietor, Directors and Headteacher ensure that pupils are taught how to keep themselves safe, based on a wide view of what may happen to pupils, not only in school but beyond it. This includes, staying safe online and the dangers of cyber-bullying – even if pupils in a particular faith community are not meant to use mobile phones or have limited access to the internet. In school they are also taught how to keep safe through stories, video clips and circle time/assemblies as well as using the NSPCC's pants rule. The Headteacher takes steps to ensure children are given opportunities within the curriculum to learn how online safety is taught through computing and PSHEE in line with the Education for a Connected World Framework as well as the DfE's guidance on Teaching online safety in schools, June 2019.  
<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>
- ◆ Parents are encouraged to read all our policies, particularly Child Protection upon joining the school. This policy is on our website and is available on request. Training events are held regularly to ensure parents understand the risks for children (including online).
- ◆ The school has a rigorous **Safer Recruitment policy** and procedure, including advert/application form/vetting procedures which are in-line with KCSIE's (September 2023) Statutory guidance, including the checks carried out on visitors to the school or volunteers and when reporting any matters to the Disclosure and Barring Service, as required. This policy is reviewed on an annual basis by the Headteacher, Proprietor and Directors in line with statutory guidance and the Local



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authority guidance. A Single Central Register is kept of all pre-appointment checks (see Appendix 5).

- ◆ 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, including the Proprietor and Directors receive safeguarding and child protection training **every year** from Camden or a specialist in the field as well as regular and timely updates (in line with safeguarding partnership advice to include Prevent and on-line safety) from the designated safeguarding lead to ensure that they remain up to date with new legislation. They are reminded regularly of their duty to disclose relevant information.
- ◆ The Proprietor and Directors receive safeguarding and child protection training needed to help them effectively scrutinise school/college safeguarding and child protection policies so that they can ensure policies are fit for purpose.
- ◆ Volunteers receive training from the DSL. Staff who join mid-year do an online course with the NSPCC and also receive induction training from the DSL before the annual Camden training each September.
- ◆ The school has procedures in place to deal with allegations of child-on-child abuse.
- ◆ The school has an attendance policy to advise on children who go missing or are absent 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. However, we may need to override those wishes if it is in the best interests of the child.

### The Headteacher, Senior Leadership Team and Training Procedures

The Headteacher is the DSL 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. She understands that she is responsible for reporting concerns against family members and contacting the safeguarding partnership or LADO on any matter which is a safeguarding concern.

The Headteacher and Senior Leadership team will ensure that the school meets its statutory safeguarding duty by ensuring the following;

- ◆ The DSL, Maria Adela Fojo Nebril, and the **Deputy DSLs**, Victoria Playford, Hemisha Varsani and Rebecca Hennigan, all receive Level 3 training every 2 years, which includes interagency working and Prevent training. They also receive informal updates from the Partnership at least annually, either in session or through emails





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and newsletters including other relevant multi-agency training courses provided by Camden Partnership.

- ◆ Staff also receive annual Online Safety Training via the National Online Safety Platform. Specific training certificates are sought for The DSL and DDSLs who receive Annual Advanced training in Online Safety as part of this platform. As well as the Managers and Leaders in the Early Years, ICT leads, Mental Health Leads, Support Staff, Governors and SENCOs.
- ◆ The DSL is responsible for Safeguarding issues within the EYFS.
- ◆ There is a designated teacher nominated to promote the educational achievement of looked after children (Maria Adela Fojo Nebril) and she will receive training for this role when relevant.
- ◆ Staff are inducted thoroughly so that they are fully aware of the DSL, DDSLs, and school safeguarding and child protection policies, having been given copies of these, as well as the pupil behaviour policy, staff code of conduct, whistle-blowing policy, online safety policy, the latest version (2023) of KCSIE Part 1, Annex A and Annex B, and the CSCP/school Attendance and Punctuality (including CME) policy so that they are fully aware of their role in safeguarding children and are able to fully implement these policies.
- ◆ Staff are inducted thoroughly in line with section 5.1 of Camden's safer recruitment and staff conduct policy for schools and colleges.  
[Schools-safer-recruitment-policy.pdf \(cscp.org.uk\)](https://www.cscp.org.uk/schools-safer-recruitment-policy.pdf)
- ◆ All staff are aware of their role and responsibilities for safeguarding under Part 1 of the guidance **Keeping Children Safe in Education (2023)**.
- ◆ The Headteacher will keep a central record of all statutory and other training undertaken by staff members, the Proprietor, Directors and volunteers.
- ◆ All staff are able to identify those children who need extra help and can make appropriate referrals to early help services.
- ◆ All staff are vigilant to harm and abuse, are able to identify those children for whom there are safeguarding and child protection concerns and can make appropriate referrals to CSSW.
- ◆ Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- ◆ Safer Recruitment practice is followed when recruiting to posts (see Safer Recruitment policy which can be accessed via the office) and appropriate action is taken whenever an allegation is made against a member of staff in line with





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Camden's policy *Safer recruitment and staff conduct policy for schools and colleges*.

- ◆ The Headteacher/Senior Deputy Headteacher brings Safeguarding issues to the attention of the Proprietor and Directors immediately and these are also discussed at termly meetings and provided within the proprietorial termly report. A written safeguarding report and an updated policy is also given to the proprietor annually in the autumn term for review. Minutes of these meetings are kept within the safeguarding lead's file.
- ◆ The policy is reviewed annually or following any regulatory or government update by the Proprietor, Directors and Headteacher/Senior Deputy Headteacher. All changes and reviews are shared with staff on a weekly basis and Safeguarding and child protection always form part of the weekly agenda.
- ◆ The school offers a safe environment for staff and pupils to learn.

### Role of the Designated Safeguarding Lead – Maria Adela Fojo Nebril

See Job Description – Appendix 9

#### *Additional Policies which link with Safeguarding*

- 1.1. Whistle blowing
- 1.2. E-Safety
- 1.3. Safer Recruitment
- 1.4. Supervision
- 1.5. Staff Code of Conduct
- 1.6. Parental involvement
- 1.7. KCSIE (Sept 2023) Part 1, Annex A and Annex B
- 1.8. Pupil behaviour policy
- 1.9. Children missing or are absent from education policy

Staff will be asked to confirm (annually) in writing that they have received and understood all relevant staff policies concerned with safeguarding.

### 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:



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- ◆ Make parents aware of our statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary. The Mulberry House School Safeguarding Policy is 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 catch ups and parental consultations/ termly meetings and the EYFS 2 Year Progress Check.
- ◆ Provide opportunities through the annual survey to consult with parents on the development of school policies to ensure that 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.

### 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, Working together to safeguard children 2018 and Keeping Children Safe in Education (KCSIE) 2023.

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

The Proprietor, Directors, Headteacher and senior leadership team will ensure these safeguarding arrangements are followed and that the school is able to raise any safeguarding issues and emerging trends with the CSCP.

Full details of the arrangements can be found [here](#).

### Contacting the Police

- ◆ In the event that a criminal offence takes place on the school premises or police assistance is needed to deal with incidents, the school will follow the guidance set out in the NSPCC guidance [When to call the police](#).

### 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



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- ◆ 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. (for example, through 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.

The school will refer to Camden's threshold and eligibility criteria (available at the link below) to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the DSL for advice and to discuss the case prior to making a referral for services where possible.

### [Camden's Thresholds and Eligibility Criteria](#)

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

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

### **Early Help Assessment**

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating.

The DSL, DDSs and all professional staff should, in particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help assessment;

- ◆ children with health conditions, disabilities and additional needs, including those with special educational needs (Whether or not they have an EHC Plan)
- ◆ children with mental health needs
- ◆ young carers
- ◆ children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime or county lines;
- ◆ children who frequently go missing or are absent from home, school or care;



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- ◆ children who are misusing drugs or alcohol or are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- ◆ children at risk of exploitation through modern slavery, trafficking, sexual or criminal exploitation;
- ◆ has a family member in prison;
- ◆ children who have returned home to their family from care;
- ◆ children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
- ◆ children who have returned home from care;
- ◆ children who show early signs of abuse or neglect;
- ◆ children at risk of radicalisation;
- ◆ children at risk from so-called 'honour' based abuse ie: FGM, forced marriage
- ◆ children who have a parent in prison or who are affected by parental offending;
- ◆ privately fostered children;
- ◆ children who are persistently absent from school including for part of the school day.

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.

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 cognitive understanding and not identifying the difference between fact and fiction online and implementing those behaviours in school. These pupils could be more prone to peer isolation or bullying (including prejudice-based bullying) without outwardly displaying any signs. They may also have communication barriers in managing or reporting these challenges. Any referrals therefore would need a close liaison with the SEND coordinator in the first school and second school site.

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

Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the school or the school will make a referral to the Early Help service (via the Child and Family Contact team) for appropriate help and



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support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.

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 be made to social services (and the Police if appropriate) immediately.

Where the child is receiving an Early Help service, the school will work as part of the Team around the Family and take up the role of lead professional where this is appropriate.

Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school believes that this is not the case, consideration should be given to 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.

### **Referral for a statutory social work service**

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the DSL or the DDSLs who are most likely to have the most complete safeguarding overview. Following consultation, the DSL will make a referral to CSSW via the Contact Service.

Where the referral raises concern that the child is at risk of significant harm, the case will be passed on to Camden's MASH team within 24 hours to gather relevant information from other agencies. The Police will also be contacted if a crime has been committed.

The Contact Service will inform the school within 1 working day of the outcome of any referral and what action CSSW will be taking. This may include any of the following:

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



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Child protection referrals can be made by phone or an e-CAF to the CSSW Child and Family Contact team under the procedures set out above for any child where there are concerns about significant harm. See Appendix 1.

### **Role of School**

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

- ◆ [Working together to safeguard children \(DfE 2018\)](#)
- ◆ [Information Sharing \(DfE 2018\)](#)
- ◆ [What to do if you're worried a child is being abused \(DfE 2015\)](#)
- ◆ [The Camden Safeguarding Children Partnership Procedures](#)
- ◆ [Keeping children safe in education \(DFE 2023\)](#)

In line with KCSIE and our 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.

### **Recognition and Responsibility**

Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the DSL.

Staff should refer to **appendix 2** for a full definition of significant harm and the specific indicators that may suggest a pupil may be at risk of suffering significant harm.

Any concerns held by staff should be discussed in the first instance with the DSL or their deputy and advice sought on what action should be taken. However, this is not essential, anyone can make a referral to MASH/OFTED. Where required, advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.

Concerns may be monitored over time and recorded on the monitoring/incident form shown at **appendix 3**. Details of any concerning incidents should also be recorded on this form.



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It is important that children receive the right help at the right time to address risks and prevent issues escalating. The school understands the importance of acting on and referring the early signs of abuse and neglect, radicalisation, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

### Dealing with Disclosures

Staff should bear in mind that children may not find it easy to disclose abuse and may need time before they feel ready to do so; in some cases, for example child exploitation, they may not recognise that what they are experiencing is abusive. Disclosure is more likely where there is a trusting relationship with the staff member and the pupil feels safe to share information.

It is important that where staff have reason to believe a pupil is at risk of harm but there is no disclosure, they persevere, giving the pupil time and space to disclose when they feel comfortable to do so. Any concerns should be shared with the designated safeguarding lead so that advice and support can be offered on how to support the pupil to engage. Consideration should also be given to addressing any communications difficulties that may be a barrier to disclosure.

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 team;
- ◆ reassure the child that what has happened is not their fault and that they were right to tell someone;
- ◆ not ask direct or leading questions but allow the child to tell their story;
- ◆ not criticise the alleged perpetrator;
- ◆ explain what will happen next and who has to be told;
- ◆ make a formal record and pass this on to the DSL.

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

### Referral

A referral will always be made to the CSSW by the DSL or their deputy following a discussion with the member of staff who has raised concerns. However, this should not





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delay any referral and any member of staff may make a referral if this is necessary and take advice from the Child and Family Contact team social worker. The DSL should be informed as soon as possible.

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

Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the DSL 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.

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

If the child already has an allocated CSSW social worker, the referral should be made directly to them. If the child is not already known to CSSW, referrals should be made to the Child and Family contact team. If the child lives outside Camden, a referral should be made to their home local authority. (Children at MHS reside in Brent/Barnet/Westminster/Camden)

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 DSL.

### Attendance at case conferences and core groups

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

The DSL will ensure that the school is represented at child protection case conferences and core group meetings:

- ◆ where possible, a member of staff who knows the child best, such as a class teacher or key person will be nominated to attend in addition to the DSL or their deputy.
- ◆ failing that, the designated safeguarding lead or their deputy will attend
- ◆ if no-one from the school can attend, the DSL will ensure that a report is made available to the conference or meeting.

### 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;



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- ◆ monitoring will be carried out by the relevant staff member in conjunction with the DSL
- ◆ all information will be recorded on the child protection monitoring/incident form shown at appendix 3 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 DSL 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 or are absent from education.

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

All information should be recorded on the safeguarding monitoring/incident form (**see appendix 3**) 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.

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

Where a child who is subject to a protection plan transfers to another school, the DSL is responsible for ensuring that copies of all relevant records are passed to the DSL at the new school within 5 days. The DSL will also contact the new school verbally as part of this process to ensure the child receives the support they need as soon as they transfer.



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Child protection records will be kept until the pupil leaves the school and should be passed on to the next school as confidential.

### 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 unless there are safeguarding concerns that need to be shared with CSSW and parents refuse consent or seeking consent would place the child at further risk.

If the child is under 12, consent to share information about them must be obtained from their parents or carers.

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.

School have a lawful basis for sharing information without parental consent where there are safeguarding concerns. **Parental consent to making a child protection referral** should be sought but if withheld, the referral must still be made and parents made aware of this. Before taking this step, the school should consider the proportionality of disclosure against non-disclosure; **is the duty of confidentiality overridden by the need to safeguard the child.**

Parents should be informed of any referral unless this would cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to safeguard the child.

Parental consent to a referral can be dispensed if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the Child and Family Contact team social worker on a "no names" basis to gain advice on whether this course of action should be taken.

Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.

In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the DSL or DDSLs or seek advice from the Child and Family Contact team social worker.



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### **Early Years**

#### **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.

#### **Statutory Framework for the Early Years Foundation Stage**

In cases of serious abuse or serious allegations of abuse the Headteacher, together with the Proprietor/or Directors will notify Ofsted within 14 days.

The Proprietor and Directors, 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.

#### **Safeguarding and Child Protection**

All safeguarding and child protection procedures listed in 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:**

- ◆ An E-Safety policy on the use of mobile phones, smart technology 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 taking place to gain consent.
  - ❖ staff seek parental permission to take photographs of the children using iPads 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.
  - ❖ The Mulberry House School does not provide children with access to 3G and 4G networks; all laptops provided to children must be connected to the schools protected network to gain access to the internet. Mobile phones and



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smart devices (including smart watches) are not allowed to be used on school grounds, reducing pupils' exposure to 3G and 4G networks.

- ❖ The Mulberry House School has web filtering in place which is provided by Exa. Exa provides analytical data which logs every site visited or attempted to visit. The Mulberry House School then stores the data logs for one month.
- ❖ The Mulberry House School also has a pro-active safeguarding/ monitoring solution by Smoothwall whereby all devices are monitored throughout the school and reports sent weekly to the Headteacher with further actions.
- ❖ The school also annually completes the 360 safe online safety review tool as part of SWGfL.

The UK Safer Internet Centre has published guidance as to what 'appropriate' might look like;

[Internet Centre: appropriate filtering and monitoring](#)

Guidance on e-security is available from the [National Education Network \(NEN\)](#)

- ◆ 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.
- ◆ Children are taught how to stay safe on-line. (*Please see our E-safety Policy*)

### Suitable people

The Mulberry House School will follow the ***Safer Recruitment 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 and are not disqualified from working in childcare settings. All staff and volunteers must make a self-declaration annually that they are not disqualified from working with children.

This will apply equally to staff and volunteers in the early year's 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 as well as the Mental Health Policy.

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 appendix 8.

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



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### 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 relevant induction as part of their probationary period
- ◆ they receive annual child protection and safeguarding training in line with Camden and this policy
- ◆ all policies set out in Camden's *Safer recruitment and staff conduct policy for schools and colleges* will apply equally to early years staff;
- ◆ all early years staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take
- ◆ all early years foundation stage and key stage one staff are able to communicate effectively in English both orally and in writing
- ◆ most teaching staff hold a current paediatric first aid certificate. They are deployed in both buildings and are available at all times and accompany children on school trips
- ◆ each child in the early years setting has a designated key person who liaises with parents to provide individual support for the child.

### 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', Hedgehogs' and Otters' classes:*

- ◆ class sizes are typically 15 pupils
- ◆ 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.

### *Badgers' variable termly with number of rising 3s and Transition classes*

- ◆ class sizes are typically 30 pupils
- ◆ there will be at least one member of staff for every 4 children (rising 3s)
- ◆ there will be at least one member of staff for every 8 children (3+ years)



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- ◆ 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 or level 6 qualification.

### *For the Prep classes:*

- ◆ class sizes are typically 25 pupils.
- ◆ classes will be led by a Level 6 qualified person along with another suitably qualified staff member.

### 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. (RIDDOR)

### Health and safety, risk assessments and suitability of premises

The Proprietor, Directors 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, in line with the DfE non-statutory advice *Health and Safety: Responsibilities and duties for schools (2018)*. The school will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves.

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 in the **Health and Safety 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 records of parents details, and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

Smoking and vaping will not be permitted on the school premises.





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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 Adela Fojo Nebril  
**Designation:** Senior Deputy Headteacher  
**Contact details:** 0208 452 7340

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.

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

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened. However, staff will **only** be permitted to use appropriate physical intervention in line with Camden's [Physical intervention and restraint policy](#).

*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. Please see their Behaviour and Discipline guidance for schools [here](#).*

#### ***Camden's policy on physical intervention and restraint***

*Physical intervention and restraint on pupils should only be used as a last resort, normally when de-escalation strategies have failed, and when there is a clear risk of serious harm to the pupil or others or serious damage to property.*

*Decisions on when to use physical intervention is a matter of professional judgement, and any intervention or restraint should be proportionate, reasonable and necessary to the perceived risk and should continue only for as long as the risk remains. Should such an*



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*intervention be required the school should record the details, including any injury, and contact the parent/carer on the same day to explain the circumstances involved.*

*Use of physical intervention and restraint for vulnerable pupils with learning and other disabilities, autism and mental health difficulties should be carefully monitored as these pupils are more susceptible to experience physical intervention and restraint due to their circumstances. Schools, and particularly special schools, should have regard for the Department of Education guidance on reducing use of restraint click [here](#).*

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**.

### Records and information sharing

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

### 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 will be expected to follow the school's **E-Safety Policy**.

### 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 (Appendix 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.



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- ◆ 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.

### 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 or email [help@NSPCC.org.uk](mailto:help@NSPCC.org.uk)

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

For further information, please see the school's Whistleblowing policy.

### 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.



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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.

### Site security and visitors

The Proprietor, Directors 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.

In general, occasional visitors to the school such as parents will not be subject to DBS checks but their movement around the premises will be supervised.

The Headteacher, the Proprietor and Directors 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.

All visitors and contractors will be:

- ◆ informed to report to reception on arrival;
- ◆ expected to provide proof of identity;
- ◆ expected to wear a visitors-badge and 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 and safeguarding procedures.

For more information on Visiting Speakers, please refer to the **Safer Recruitment Policy**.

The Headteacher, the Proprietor and Directors 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.

Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher/principal will request written confirmation that relevant checks have been carried out for that individual.

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



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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).

### 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.

The school recognise that alternative provision may increase risk for vulnerable pupils and will follow the relevant government guidance:

<https://www.gov.uk/government/publications/alternative-provision>

<https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school>

### 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 The Mulberry House School hours for the purposes of providing supplemental schooling if the organisation can demonstrate it is able to keep children safe. The Proprietor and Directors will ensure:

- ◆ the organisation provides an overview of what it intends to teach so that the Proprietor and Directors are able to make a judgement on whether this is in line with the promotion of British values
- ◆ the organisation can provide copies of child protection policies and procedures and the school accept these as adequate;
- ◆ 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)
  - ❖ details of the agreement are recorded on the partnership agreement record with clear provision for the circumstances under which the agreement can be terminated by the school/college for breach.



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- ◆ Organisations will be expected to meet the requirements set out in the Department of Education guidance [here](#) before the school will allow the premises to be used.
- ◆ Any allegations arising from incidents happening when the school is being used by another organisation should be dealt with by the school under the CSCP Guidance for schools on dealing with allegations against staff and volunteers. [Introduction \(cscp.org.uk\)](#)

### 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, the Proprietor and Directors will ensure that:

- ◆ all school policies are regularly monitored by the DSL and annually reviewed by the Headteacher, Proprietor and Directors;
- ◆ staff are aware of their responsibility to record accidents and incidents and these are reviewed termly by the Health and Safety officer;
- ◆ the Headteacher has an overview all accidents/incidents;
- ◆ serious accidents and incidents are reported to the Proprietor or Directors;
- ◆ the DSL 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 and Directors to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

### Non-collection of children from school (see Uncollected Child Policy)

### Children Missing or Absent from Education (CME), Attendance and Punctuation Policy

#### Children who are missing or absent 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. Parents should be asked to provide contact details for at least 2 or more people who can be contacted in the event that a child does not attend school. Schools should refer to Camden's "Children missing or absent from education" policy and the CSCP missing children protocol for further details available at:*



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### [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Partnerships](#)

All children will be entered onto the admissions register on their first day that the pupil attends the school. If a child fails to attend, then the school will notify the local authority. The school will monitor attendance through daily registers and inform the local authority if a child fails to attend regularly or has missed 10 school days or more without permission. All poor attendance will be referred to the local authority.

The school will also notify the local authority of any child who joins or leaves the school at non-standard transition points.

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 Children's Safeguarding and Social Work (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.

### Monitoring Attendance

Regular attendance at school correlates closely to raising achievements, thus underlying the importance of improving attendance rates. All staff should be committed to the successful implementation of this **policy**. At Mulberry House School we expect pupils to attend school regularly and to arrive on time. Parents/Carers are expected to let the school know by e-mail if there is any problem, which may prevent their child from attending school.

### Registration procedures

Accurate registration is central to maintaining the schools' attendance and punctuality policy. Staff must complete registers in accordance with the instructions provided by the office.

Every week registers will be checked to ensure that the required standards are being met.

### Good Practice

By law, only the school can authorise an absence. A written note or telephone call by a parent/carer does not, in itself, oblige the school to authorise absence if the school does not accept the explanation offered as a valid reason for absence. The decision lies with the Headteacher. All reasons for absence must be recorded in the register and a written





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reason for the absence produced by the parent and records kept. The school encourages full attendance, this ensures children access the school curriculum and achieves their full potential. Where a child is not well enough to attend school a written explanation must be provided by the parent for the attention of the class teacher. This should be sent in advance of the absence or in the morning before school to [info@mulberryhouseschool.com](mailto:info@mulberryhouseschool.com).

Where there are ten days of unauthorised absence (other than for reasons of sickness or leave of absence), we are required to report the circumstances as soon as possible to the local authority in which the pupil lives. Parents will be notified that this is taking place as part of our duty of care.

### Punctuality

The school actively discourages late arrival. Children must be signed in and out by the parent or carer at drop off and collection. Children arriving at school late must sign the late book. Where pupils miss registration altogether and fail to provide an adequate explanation, they should be marked as unauthorised absence for that session, even though they may arrive later, 'late after registers close'. Pupils will be recorded as late in the register. All periods of lateness and absence are recorded in the end of year report for children of compulsory school age.

Once the register has been taken, the teacher will check with the office as to whether an email has been received and then will call the parents to ascertain where the child is. For Children Missing or Absent Education, please see the school's Safeguarding policy. Schools should also refer to Camden's [Children missing or absent from education](#) policy for further details.

All children will be entered onto the admissions register on their first day that the pupil attends the school. If a child fails to attend, then the school should notify the local authority. The school will monitor attendance and through daily registers and inform the local authority if a child fails to attend regularly or has missed 10 school days or more without permission. All poor attendance will be referred to the local authority.

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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 Children's Safeguarding and Social Work (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.



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Teachers should check registers weekly and notify the Headteacher if a child is persistently late or absent (3 recorded lates over a period of 10 days). The school may have cause to place a child under welfare monitoring if lateness and regular absence persist.

### **Illness, medical and dental appointments**

No offence is committed where a pupil of compulsory school age is prevented from attending school by reason of illness. Teachers should be alert to emerging patterns of authorised absence through illness, and consult with the Headteacher if this seems excessive.

### **Extended holidays & overseas visits**

Parents who wish their child to be away from school must apply in writing to the Headteacher. The Headteacher needs to be satisfied that the visit constitutes 'exceptional circumstances'. All children on 'holiday leave' will be asked to complete a workbook during their time away. If the child fails to return to school on the agreed date, the continued absence will be unauthorised.

The Headteacher will inform parents/carers that more than 4 weeks unauthorised absence may result in the Headteacher removing the child's name from the school's admission list.

### **Responsibility of the Headteacher**

- ◆ Oversee implementation of attendance policies and procedures.
- ◆ Ensure the collection of accurate statistical data.
- ◆ Develop efficient monitoring and evaluation systems.
- ◆ Promote good attendance & punctuality.
- ◆ Work with parents to ensure they understand the importance of good attendance and punctuality.

### **Responsibility of the teachers**

- ◆ Ensure accurate register keeping, using only those codes agreed by the DfE.
- ◆ Communicate with the Headteacher regarding individual pupil's attendance.
- ◆ Positively promote good attendance and punctuality within the classroom.
- ◆ Make positive links with parents/carers.



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### Responsibility of the Parents

- ◆ Setting the standard for attendance and punctuality.
- ◆ Notify the school in writing when their child is ill.
- ◆ Ensure that they are proactive in seeking any work their child has missed. This is so that teachers and other pupils do not adversely suffer in recapping on work missed.
- ◆ Cooperate with the school in ensuring children do not take holiday outside of holiday periods.

### *Emergency contact numbers/information forms*

Copies of all children's emergency information forms are located in each child's file in the school office and on the school's system.

Emergency Information Forms are filled in when a child joins the school and then updated annually thereafter.

For single parents we require two emergency contact numbers, separate to them and if there are two parents, we require only one additional contact number to be provided. We will also contact this responsible adult when a child is missing education.

### IMPORTANT INSTRUCTIONS TO STAFF ON COMPLETING REGISTERS

#### *Advice on using the Absence & Attendance Codes*

The register must be completed via the pre-set excel register at the beginning of the a.m. and p.m. sessions.

Present	1
Unauthorised Absence	O
Late	L
Late - after 9:30am	U
Assessment	J
Approved Holiday	H
Illness	I
Unapproved Holiday	G
Medical appointment	M
Authorised Absence	A
Religious Observance	R
Enforced Closure	Y
School Closed	#
Key Worker (But not in	C



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attendance)

Not in attendance due to public  
health advice

X

Grey squares to be left blank

Totals of children attending should be made for a.m. and p.m. and daily total attendance.

If a child is absent due to illness the parent should send an email to the school explaining their child's absence. The child should be marked as unauthorised absence if the reason of the absence is unknown and then teachers should follow up with parents and the office to determine the reason for the absence and update the register accordingly.

### Children who harm other children (child on child abuse)

The school will ensure that all staff are aware of child on child abuse and know what action to take when a pupil's behaviour is likely to cause harm to other pupils.

This may be through:

- ◆ bullying and cyberbullying
- ◆ physical violence
- ◆ sexual violence and sexual harassment
- ◆ upskirting
- ◆ sexting
- ◆ initiation/hazing type violence and rituals
- ◆ Consensual and non-consensual sharing of nudes and semi-nudes and/or videos
- ◆ causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

All incidents of child on child abuse will be dealt with under the *child on child and sexual violence and harassment guidance for schools and colleges*. Where appropriate, the school will refer the perpetrator and the victim to the Child and Family Contact team under the *child on child abuse* protocol. A copy of these policies can be found [here](#).

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.

Where the harm is attributable to sexually abusive behaviour or sexual harassment, the school will follow the statutory guidance as set out [here](#). We will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.



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Staff should recognise that children are capable of abusing their peers and that this can happen both outside and inside of the school. Our various anti-bullying and behaviour strategies seek to minimise the risk of child on child abuse. Should a child make an allegation of child on child abuse, it should be reported to the Designated Safeguarding Lead who will work with the staff member and the parents of both victim and perpetrator where necessary. These should be recorded in the School's incident report form (in the first instance). Different forms of child on child abuse can take place, but abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up".

Any concerns about a child should always be reported to the DSL or DDSL. All child on child abuse is unacceptable and will be taken seriously and there is a zero tolerance approach to child on child abuse at school. Staff are made aware that even where there are no cases reported, this does not mean that it is not happening and they should be aware of how to spot signs of child on child abuse. Child on child abuse can manifest itself in many ways, not just through physical bullying (**including hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm**), bullying (including cyber-bullying, **prejudiced-based and discriminatory bullying**), **abuse in intimate personal relationships between peers** (your young pupils may see this at home) or on-line sexting, such as controlling behaviour, coercive behaviour, honour-based violence or 'stalking', sexual violence, sexual harassment, upskirting, physical abuse, sexting, initiation, hazing type violence and rituals. Different race and gender issues can be prevalent when dealing with child on child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

The school will reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making a report.

The DfE provides searching screening and confiscation advice for schools [here](#).

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.



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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 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.

### Harmful Sexual Behaviour and Serious Violence and Harassment

The school recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated within or outside the school premises. The school behaviour management and anti-bullying policies reflect the school's approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of '**it could happen here**' and that if there are no reported cases of child on child abuse, such abuse may still be taking place and simply not reported.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Staff are made aware that they should not view or forward illegal images of a child. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

The school will follow the statutory guidance [Sexual violence and sexual harassment between children in schools](#) and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.



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- ◆ The school will take all necessary steps to put in place a planned PHSEE curriculum to convey the school's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct.
- ◆ The school will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be thoroughly investigated by the school, taken seriously and appropriate referrals made to the police and CSSW.
- ◆ The school will ensure that staff, the Proprietor and Directors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff and to enable them to report such incidents to the DSL.
- ◆ The importance of schools recognising, acknowledging or understanding the scale of harassment and abuse, as downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- ◆ To raise a concern, the pupils can use our 'Buddy' (NSPCC) mascot if they want to talk confidentially to a teacher or the Headteacher, they can also report this as part of our 'worry box', and/or speak to a teacher directly to discuss their concerns. All concerns will be taken seriously.
- ◆ The school will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

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

### Procedures

- ◆ The school will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the *Keeping children safe in education* statutory guidance.
- ◆ The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- ◆ Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the DSL, who will also carry out a risk





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assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the school/college environment.

- ◆ It is important that schools consider every report on a case-by-case basis as per paragraph 448 of KCSIE, September 2023. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. This does not stop the school taking immediate action to safeguard children, where required.
- ◆ Consideration should be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.
- ◆ Where the allegation involves material posted online, the school will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance [\*Searching, screening and confiscation advice for schools\*](#).
- ◆ The member of staff and DSL will write up a record of the investigation that will set out how the school will respond to the incident.
- ◆ Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the *CSCP Harmful sexual behaviour protocol*. The DSL may take advice from MASH social workers before making a decision. Possible outcomes include referral to Early Help Services, CSSW or the police, or managing the matter internally under school behaviour policies.
- ◆ Where a referral will be made to CSSW or the police under the protocol, the DSL will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.
- ◆ The school will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and CSSW investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- ◆ Where necessary and appropriate, the school will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf under the [\*Harmful sexual behaviour\*](#) protocol.



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### Options to manage the report

There are four likely scenarios for schools to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action.

#### 1. Manage internally

- ◆ In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help assessment or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- ◆ Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- ◆ All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

#### 2. Early help assessment

- ◆ In line with 1 above, the school may decide that the children involved do not require referral to statutory services but may benefit from early help assessment. Early help assessment means providing support as soon as a problem emerges, at any point in a child's life. Providing early help assessment is more effective in promoting the welfare of children than reacting later. Early help assessment can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help assessment process is and how and where to access support.
- ◆ More information on Early Help Assessment is set out in Part one of this guidance with full details of the early help process in Chapter one of Working Together to Safeguard Children.
- ◆ Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.
- ◆ Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).



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- ◆ Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- ◆ All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

### 3. Referrals to children's social care

- ◆ Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local children's social care.
- ◆ At the point of referral to children's social care, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- ◆ If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- ◆ Where statutory assessments are appropriate, the school (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- ◆ Schools should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school should be immediate.
- ◆ In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) should consider other support mechanisms such as early help assessment, specialist support and pastoral support.
- ◆ Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- ◆ All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).



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### 4. Reporting to the Police

- ◆ Any report to the police will generally be in parallel with a referral to children's social care (as above).
- ◆ It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.
- ◆ Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: When to call the police.
- ◆ Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- ◆ At this stage, schools will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.
- ◆ All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.
- ◆ In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- ◆ Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions the school takes does not jeopardise the police investigation.
- ◆ If schools have questions about the investigation, they should ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).



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### Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood. The school also recognises that some pupils may experience mental health issues that can negatively affect their behaviour and their ability to participate fully in education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may have been experiencing a mental health problem or be at risk of developing one.

The Mulberry House School recognises that it has an important role to play in supporting mental health and the wellbeing of our pupils. The school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The school accesses a range of advice to help identify and help children in need of extra mental health support; this includes working with external agencies as well as setting up any wellbeing plans. More information can be found in the school's Mental Health and Wellbeing Policy, which is available for all pupils, staff and parents.

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

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

Where there are safeguarding concerns arising from a pupil's mental health issues, staff will discuss concerns with the designated safeguarding lead to agree any actions to be taken.

### Prevention of radicalisation

The DSL and DDSs have undertaken training on how to identify, children, young people and staff who are at risk of radicalisation. The school will assess the risk of children being drawn into terrorism, and who may be at risk of radicalisation. All staff also receive channel awareness and prevent training annually to enable them to identify children at risk 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, see *The Mulberry House British Values Statement* and government guidance [here](#).



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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 duty guidance](#) where there are concerns that they are being radicalised.

The school will endeavour to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. Where possible, these practices should be age appropriate and delivered through a planned component of the curriculum. Children should understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse, or radicalise other people, especially children, young people and vulnerable adults. Internet safety is an integral part of the school's computing curriculum as well as PSHEE and Relationships education.

### [The use of social media for on-line radicalisation](#)

The UK Safer Internet Centre [www.saferinternet.org.uk/about](http://www.saferinternet.org.uk/about)

CEOP's Thinkuknow website [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

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 with the DSL and also consider external advice and guidance where necessary and appropriate.

The DSL 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 (Mark Fowler, [Mark.P.Fowler@met.pnn.police.uk](mailto:Mark.P.Fowler@met.pnn.police.uk) or call 0208 733 6014) and Camden's Prevent co-ordinator (Albert Simango, [albert.simango@camden.gov.uk](mailto:albert.simango@camden.gov.uk) 020 7974 2010) or the Prevent Education officer (Jane Murphy, [jane.murphy@camden.gov.uk](mailto:jane.murphy@camden.gov.uk) 0207 974 1008) or the DfE non-emergency helpline: 0207 340 7264 and [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

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.

The school/college will follow the guidance set out in the CSCP guidance "Safeguarding children and young people from radicalisation and extremism" where:



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- ◆ 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.

### 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](#).

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 [CSCP guidance](#) and the [CSCP Mandatory Reporting Guidance](#) and the [Home Office Mandatory Reporting Guidance](#).

All concerns around FGM, including any disclosure made by a pupil, will be discussed with the DSL and Children's social care as appropriate.

### Online Safety

As part of its duty to provide a safe learning environment and ensure pupils are taught how to remain safe online, including the dangers of cyber bullying even if pupils have limited access to mobile phones and the internet, the school will implement the recommendations of Camden's model schools [online policy](#).

### Relationships Education, Relationships and Sex Education (RSE) and Health Education

The school will ensure that children are taught through the wider curriculum, how to stay safe, based on a wide view of what may happen, not only in schools but also beyond it. Please see the school's Relationships Guidance Policy.

### 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 (the DSL currently) has specialist knowledge of the issues faced by this cohort and, for this reason, she will consult with external agencies when necessary to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

### [Promoting the education of looked after and previously looked after children](#)





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### 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. The school/college will follow the CSCP guidance *Safeguarding children with disabilities* available at:

<https://cscp.org.uk/wp-content/uploads/2019/06/Safeguarding-children-and-young-people-with-disabilities-guidance.pdf>

Where there are concerns about abuse involving a pupil with SEND, the designated safeguarding lead will liaise with the SENDCO. The school/college will consider extra pastoral support for pupils with SEND including extra help in supporting communication.

We are aware that SEND pupils are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.

### 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 who have a social worker

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

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

The school will work in partnership with social workers and the Camden Virtual school head to implement the child's plan in order to support their education and safeguard and promote their welfare. A representative of the school who knows the pupil well will become part of the professional network and will share information about safeguarding



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risks and attend planning meetings. In their absence, a suitable colleague will deputise for the member of staff or a written report will be provided for meetings.

### *Children at risk of forced marriage*

[Forced marriage – Detailed guidance – GOV.UK](#)

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

Staff should be aware of the nature of domestic abuse and recognise the harm it may cause to children who witness incidents. For more details please refer to the CSCP guidance on domestic abuse.

<https://cscp.org.uk/resources/domestic-violence-and-abuse/>

*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://cscp.org.uk/resources/private-fostering-resources/>

*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://cscp.org.uk/resources/young-carers/>

*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)

### *Pupils who are lesbian, gay, bi or trans (LGBT)*

The school recognises that LGBT pupils, or pupils who are perceived to be LGBT, may be more vulnerable to bullying, harassment and victimisation and may find it difficult to disclose to staff due to a lack of trust in adults. The school/college will provide safe spaces and opportunities for LGBT pupils to raise concerns and will ensure that LGBT inclusion is part of the sex and relationships curriculum.

### *Contextual safeguarding and extra-familial harm*

The school is aware that as young people grow more independent and spend more time away from home, they may face more risk from safeguarding threats outside of the home.



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These threats may be from within the community, from other pupils at school or from their own peer group rather than from within the family (extra-familial harm).

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

The school will adhere to the following policies whenever there are concerns that young people are at risk from extra-familial harm:

*Young people can be at risk from extra-familial harm such as threats to their safety or welfare arising from behaviours and circumstances occurring outside of the home such as substance misuse, involvement in gangs, serious violence, criminal and sexual exploitation. Even though there are no concerns about parenting, these threats may still raise safeguarding concerns that need to be addressed.*

*Schools should be aware of the indicators that a young person may be involved in violent crime or may be being criminally exploited and as such at risk from becoming a victim of violence. Indicators include absenteeism, changes in friendship groups, declining academic performance, changes in emotional welfare and signs of physical assault.*

*Those children who are involved in county lines exploitation (where the child is coerced into selling drugs) may also be in possession of goods and money and may own several mobile phones.*

*Young people experience physical, cognitive and emotional changes during adolescence and will grow more independent, spending more time away from home. They may pursue risky behaviours and as a result, they may face heightened risk from safeguarding threats outside of the home.*

*These threats may be from within the community, from other pupils at school/college or from their own peer group rather than from within the family and there may be no concerns about parenting other than concerns about supervision. Sources of harm and exploitation can include:*

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

*Exploitation is a form of abuse involving an imbalance of power within a relationship that allows one party to use this power to manipulate another to carry out an act. The*



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*victim may believe that they are acting on their own accord but in fact their consent has been obtained through deception, duress or force and threats of violence. They may also be moved into the UK or around other towns and cities in the UK to facilitate their exploitation. The exploitation of the young person is a form of modern slavery and their forced movement is trafficking, both of which are criminal offences.*

*Factors such as substance misuse and periods of going missing from home or school can also add to young people's vulnerability to extra-familial harm and are often indications that exploitation may be taking place.*

The school will adhere to the CSCP guidance [Extra-familial harm and child exploitation](#) whenever there are concerns that young people are at risk from extra-familial harm or exploitation:

### **Children at risk from gang activity or serious violence and sexual exploitation**

*Child Sexual Exploitation / Camden Safeguarding Children Partnership*

*Schools should be aware of the indicators that a young person may be involved in violent crime or may be being criminally exploited and as such at risk from becoming a victim of violence. Indicators include absenteeism, changes in friendship groups, declining academic performance, changes in emotional welfare and signs of physical assault. Young people at risk from [gang activity](#) or serious youth violence*

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.

### **Children who experience mental health issues**

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

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

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

Where there are safeguarding concerns arising from a pupil's mental health issues, staff will discuss concerns with the designated safeguarding lead to agree any actions to be taken.

The school/college will ensure that staff have an understanding of trauma informed practice and its link with mental health and are able to recognise pupils who are experiencing mental health issues and help them to access the most appropriate help.



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

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

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

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/755135/Mental\\_health\\_and\\_behaviour\\_in\\_schools\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf)

### **Modern Slavery and Trafficked Children**

[Child Trafficking / Camden Safeguarding Children Partnership](#)

*The CSCP protocol provides guidance for agencies where it is thought children have been trafficked into or within the UK or where they are vulnerable to modern slavery/forced labour. This includes young people who are criminally exploited under the county lines model. For more information on county lines see the Home Office guidance.*

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

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

[Policies / Guidance / Camden Safeguarding Children Partnership](#)

*Schools should also be aware that many of these forms of exploitation are linked and that going missing from home or from education can be an indicator that young people are involved in child sexual exploitation, gang activity, modern slavery, criminal exploitation and trafficking.*

*Additional DfE policies and guidance*

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

### **Alternative Provision**

<https://www.gov.uk/government/publications/alternative-provision>

### **Attendance**

<https://www.gov.uk/government/publications/parental-responsibility-measures-for-behaviour-and-attendance>



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### **Anti-discrimination & harassment**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/)

### **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)

### **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**

[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**

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

### **Female genital mutilation**



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**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 against women and girls**

**Health and safety**

<https://www.gov.uk/government/collections/health-and-safety-in-schools>

**Intimate care**

**No smoking (EYFS)**

***Supporting children with medical conditions***

[Supporting pupils at school with medical conditions - Publications - GOV.UK](#)

**Mental Health**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/508847/Mental\\_Health\\_and\\_Behaviour\\_-\\_advice\\_for\\_Schools\\_160316.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf)

**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](#)

**SRE**

<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

***Sexting***





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[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)

### **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)

### ***Additional school policies and procedures***

Risk assessments
Uncollected child procedure
Sick child procedure
Emergency accident procedure
Health and Safety policy
The Staff Handbook
Confidentiality Policy
The Management of Medicines Policy
Supervision policy
SEND policy
EAL policy
Attendance and Punctuality policy
Statement of Intent - Health and Safety



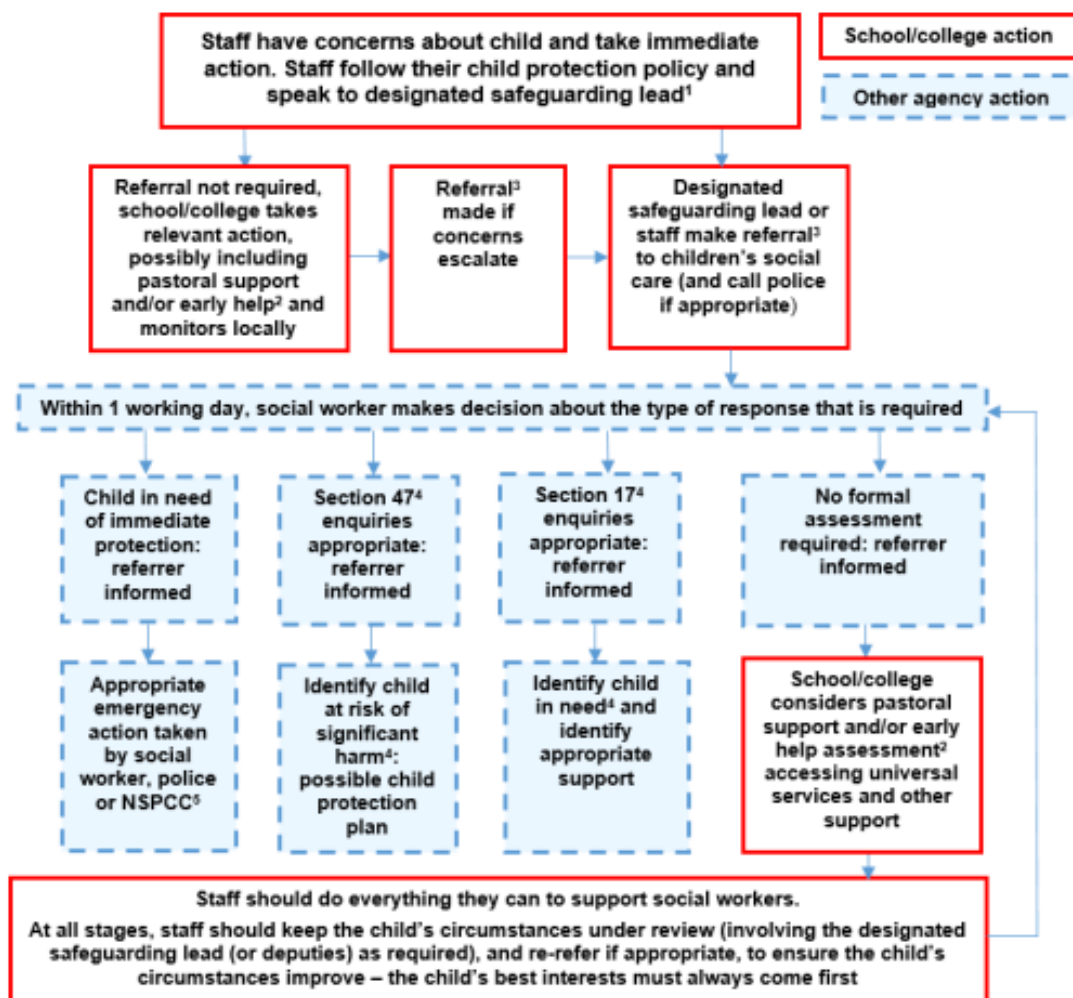
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## Appendix 1



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### Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> 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. See [Working Together to Safeguard Children](#) for further guidance

<sup>3</sup> 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](#).

<sup>4</sup> 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](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).



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### Appendix 2

#### 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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 caregivers); 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:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 and



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all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

**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</li></ul>



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	exploitation/older boyfriend <ul style="list-style-type: none"> <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>



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**Appendix 3**

**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





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☐ referral for behavioural support

☐ referral on behalf of parent/carers

**Action taken**

Name of staff member:

Signed by Lead for Safeguarding

Date:



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### Appendix 4

#### Legal Duties

##### Human Rights Act 1998

The Human Rights Act 1998 sets out an individual's rights and freedoms under the European Convention and public organisations such as schools must ensure that these rights and freedoms are protected whenever decisions are being made about an individual pupil. The relevant rights are:

- Right to an education (Article 2)
- Right to freedom from inhuman and degrading treatment (Article 3); this is an absolute right that cannot be limited in any way
- Right to respect for privacy and family life (Article 8); this is a qualified right which must be balanced against the rights of others.

Any form of (sexual) harassment, violence or abuse may be a breach of these rights.

##### Equality Act 2010

The Equality Act states that public organisations such as schools must not unlawfully discriminate against pupils or students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy or maternity, or sexual orientation. This means schools must consider whether they are affording the same level of safeguarding to pupils with these protected characteristics as all other pupils.

Schools must be able to demonstrate that they have taken proportionate positive action and/or made reasonable adjustments in order to deal with the disadvantages faced by these groups. For more guidance see:

[Equality Act 2010: advice for schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/equality-act-2010-advice-for-schools)

##### Equality Duty

Under the Equality Act, public organisations such as schools have a duty to eliminate unlawful discrimination, harassment and victimisation and ensure equality of opportunity for all pupils. When making decisions, schools must be aware of this duty and ensure that decisions do not unlawfully discriminate against groups of pupils or students who are protected under the Act. For example, schools should be aware that some groups of pupils, for examples girls or LGBTQ pupils may be more vulnerable to sexual violence or harassment. For more information please see: [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com/equality-duty-england/)



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### Appendix 5

#### The Mulberry House School Central Register

##### *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
- ◆ All members of the proprietorial body

##### *Agency staff*

- ◆ All agency staff are included on the SCR. As part of this, we receive written confirmation from any agency, or third-party organisation that they have carried out the same checks as the school would perform on any individual working at the school (including online). The written confirmation confirms that the enhanced DBS check has been carried out by them or another such business. On arrival, the people presenting themselves are asked to bring ID and their original DBS certificate, which is checked against the agency documents provided.

##### *Volunteers*

- ◆ For volunteers in regulated activity who regularly teach children and who provide personal care, an enhanced DBS is needed with a barred list check.
- ◆ For volunteers not in regulated activity, schools should obtain an enhanced DBS certificate but without barred list information. We would carry out a written risk assessment and assess and make checks according to the risks indicated.
- ◆ If the volunteer is supervised, but not in regulated activity, an enhanced DBS check may be obtained but without barred list information. We would carry out a written risk assessment and assess and make checks according to the risks indicated.
- ◆ If the volunteer is un-supervised and in regulated activity, an enhanced DBS check may be obtained with barred list information.



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- ◆ 'One off' volunteers, for day outings, school concert and such would not require vetting checks, but they should not be unsupervised and/or must not undertake any kind of personal care.
- ◆ 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 p194 of Commentary) – the period condition is both 'regular' and 'frequent' at any time on more than four 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 the DBS numbers are listed. Other documents to verify identity, right to work in the UK and qualifications etc., must be kept in personnel files. Any other pre-appointment documentation is at the discretion of the school (the member of staff will know that these checks have been required).



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	Surname	First name (s)	Date of birth	Identity Check	Start date	Job title	Qualifications (academic/professional) Including whether QTS (Including name of university/awarding body where relevant)	QTS Teacher Ref number:	DBS (All enhanced level checks)	Date DBS Check seen	Barred List	Nationality and Eligibility to work in the UK	Overseas police check received/EEA	Work permit	Ref 1	Ref 2
Check																
Name of Checker																
Date of Check																
Check																
Name of Checker																
Date of Check																



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	Application form/CV	Medical fitness	Staff code of conduct	Disqualification on self declaration	4 Prohibition from teaching checks	Prohibition from management checks	Online Checks	Comments
Check								
Name of Checker								
Date of Check								
Check								
Name of Checker								
Date of Check								



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### Appendix 6

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

## 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 are received, that at the discretion of the Headteacher, you may be asked to start work before receipt of the DBS check. Both references **must** be received before you commence employment with the school and all other recruitment checks.

In this situation, we undertake a separate check of The Barred List. 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 and all other safeguarding documents for induction.
4. Ensure you receive your safeguarding induction session and 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. 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.....





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### Appendix 7

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

## 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 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.
- ◆ The Mulberry House School is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times.
- ◆ 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



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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.
- ◆ The children will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for him/herself as he/she can. This may mean, for example, giving the child responsibility for washing themselves.
- ◆ 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 Equality Act 2010.

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.



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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 contains nappies and nappy wipes, is taken into the nappy room or designated area
- ◆ 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.
- ◆ 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 on the staff portal, which can be access via the school's website and will be available for staff to refer to at all times.



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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.



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### Appendix 8

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

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

A member of staff

Headteacher

Proprietor and Directors

Designated Safeguarding Lead (DSL)

Volunteer

Contractor

Other staff, including supply staff

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 and within one working day to the LADO.

Safeguarding is the highest priority at the school and as such we have a duty to safeguard pupils by ensuring that only staff who are suitable to work with children are employed, so it is crucial that there is a robust process in place for dealing with any allegations of harm or abuse by a staff member or volunteer against a pupil.

This policy sets out the procedures to be followed by the Headteacher, Proprietor and Directors when dealing with allegations and concerns raised against a member of staff or volunteer that has:

- ◆ behaved in a way that has harmed a child, or may have harmed a child
- ◆ possibly committed a criminal offence against or related to a child,
- ◆ behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or



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- ◆ behaved or may have behaved in a way that indicates they may not be suitable to work with children, for example behaviour in their private life that raises concerns (a *transferrable risk*).

As well as covering the four categories of harm and abuse, allegations involving inappropriate relationships with pupils, grooming behaviour on-line, possession of indecent photographs or images of children and other offences under the Sexual Offences Act 2003, and including activities and behaviour taking place outside school that involve a transferrable risk, should also be dealt with under this policy.

All allegations against a member of staff, designated safeguarding lead, volunteer or supply staff must be referred to the Headteacher. In the absence of the Headteacher, the allegation should be passed to the Proprietor (Bethan Lewis-Powell) or Directors (Cari and Duncan Binet Fauvel). 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, this will be reported to the Proprietor (Bethan Lewis-Powell) or Directors (Cari and Duncan Binet Fauvel) without notifying the Head first. Allegations against staff that have since left the school are not dealt with under this policy and should be referred to the police.

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

The Head will usually take the lead while keeping the supply agency fully informed and involved. In no circumstances would the school stop using supply staff for safeguarding reasons.

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

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



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

### **Section One: Allegations that may meet the harms threshold:**

- Concerns and allegations that involve possible harm to a child will be dealt with under this policy. This includes any concerns relating to transferrable risks even where the named child has not been harmed on this occasion.

### **Section Two: Concerns that do not meet the harms threshold:**

- Low level concerns that do not involve harm to a child but raise concerns about the staff member's professional behaviour will be dealt with via internal procedures based on the school's staff conduct policies.

Camden follows the London Safeguarding Children Partnership child protection procedures for dealing with allegations against staff (section 8) and schools should be aware of their role under these procedures.

[https://www.londoncp.co.uk/alleg\\_staff.html](https://www.londoncp.co.uk/alleg_staff.html)

For help in deciding whether an incident meets the harm threshold, agencies can refer to the National LADO network thresholds guidance.

[LADO Threshold Document - national-lado-network.co.uk](https://www.national-lado-network.co.uk)

### **Low level concerns that do not involve harm**

Low level concerns about a member of staff that do not involve harm to a child but raise concerns about the staff member's professional behaviour are not within the remit of this policy and schools should deal with these concerns under the school's own staff conduct policies.

However, if schools are unclear whether a concern meets the threshold of harm, the designated safeguarding lead may contact the LADO for advice on a "no names" basis. Further information is available in the *Safe recruitment and staff conduct* model policy.

### **Section one: Allegations that may meet the harms threshold**

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 in their current position, or in any capacity with children in a school.



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The Proprietor and Directors have 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 publish information about an investigation or decision in a disciplinary case.

This document cannot cover every eventuality. The Headteacher must assess each allegation in 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. This is to discuss any allegations, to consider the nature, content and context of the allegation and agree a course of action, including any involvement of the police. GDPR cannot stand in the way of safeguarding children.

This guidance will be followed where it is alleged that anyone working in a school that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- ◆ Behaved in a way that has harmed a child, or may have harmed a child and/or;
- ◆ Possibly committed a criminal offence against or related to a child and/or;
- ◆ Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or;
- ◆ Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This could include behaviour that happened outside of school or college that might make the individual unsuitable to work with children, known as a transferable risk. In this instance we would seek the advice of the Local Authority Designated Officer (LADO).

### **Notification and referral**

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





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A written note of the details of the allegation, including times, dates, locations and the nature of the concern must be agreed with the Headteacher. Pupils should not be promised confidentiality.

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

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

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

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

<https://cscp.org.uk/professionals/managing-allegations-against-staff-and-volunteers-lado/>

The LADO will contact the referrer as soon as possible and to discuss the case and decide what action to take.

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

### Initial consultation and response to an allegation

There are two aspects to consider when an allegation is made:

- ◆ Looking after the welfare of the child - referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.



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- ◆ Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

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

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

As a result of this initial consultation, the school representative and the LADO should agree what action to take, which may be:

- referral to the police for consideration of whether the threshold for a criminal investigation has been reached or for additional information;
- referral to CSSW for assessment and possible child protection investigation where a child may be eligible for services;
- initiation of disciplinary proceedings against the member of staff by the school/college; if the case does not involve harm to the child, agreement will be made for the school/college to deal with the matter as a low level concern under their staff conduct policies (see section 2);
- no further action to be taken as the allegation has proved to be unfounded or malicious.

When dealing with allegations, schools and colleges should:

- ◆ apply common sense and judgement;
- ◆ deal with allegations quickly, fairly and consistently; and
- ◆ provide effective protection for the child and support the person subject to the allegation.

Some cases may not involve harm to pupils and will not require an immediate response from the police or CSSW; in these cases, agreement will be made for the school to deal with the matter under local school policy as a professional



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standards matter. If following the school's own investigations there are concerns, the school should refer the matter back to the LADO for action to be taken under this policy.

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

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

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

Consideration should also be given to whether the seriousness of the allegations warrants the member of staff being suspended or whether they should continue to have contact with the child involved or any other pupil.

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

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

### 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.

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Reviewed by: VP/BLP  
Next review: Sep-24



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- ❖ 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 (and ISI), as soon as is reasonably practicable, but at the latest within 14 days.
- ◆ Inform the Proprietor/Directors 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' (2018) 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.

### Procedure for School Action

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

- ◆ Report to the Headteacher immediately or to the Proprietor/Directors 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.



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### 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 children.
- ◆ 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/Directors
- ◆ 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, Proprietor or Directors 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.
- ◆ Record any conversations or communication with both the individual and the parents of the child/children agreed.
- ◆ 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 only be taken by the LADO or at the LADO's request, and 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.***



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

- ◆ The child/children is/are not at risk of significant harm.
- ◆ A reportable offence has not been committed.

### **Allegation against staff and volunteers meeting**

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

Sometimes the individual working for an organisation may be working independently and self-employed and may not have an employer with whom matters can be taken up. In these cases the LADO and the organisation will consider how to proceed and will look to involving any relevant professional or trade associations or organisations to ensure that appropriate action can be taken to secure children's safety in the future.

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

The meeting will:

- ◆ decide whether or not the pupil has or is likely to suffer significant harm and whether to instigate a child protection and/or criminal investigation which may be jointly conducted between the police and CSSW;
- ◆ look at what disciplinary processes should be put in place;
- ◆ consider the allegation in the light of any previous allegations or concerns and whether the staff member was acting reasonably in line with the school's behaviour policy;
- ◆ make a decision about suspending the staff member where this is a proportionate response;
- ◆ consider what action should be taken to ensure the safety of the pupil involved and all other pupils;
- ◆ agree the plan for investigating the allegation and providing support to the staff member and the child whilst the investigation is on-going;
- ◆ agree what information should be shared between agencies and how issues relating to media reporting or containing speculation will be dealt with.



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

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

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

### Review Meeting

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

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

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

### Allegation Outcomes

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.



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- ◆ **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the school or college depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position, an individual should be suspended only if there is no reasonable alternative.

If the allegation is substantiated and:

- ◆ the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- ◆ the employer ceases to use the person's services.

The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff at a school, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

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 that staff member to the Teaching Regulation Agency.

### [Teacher misconduct: the prohibition of teachers](#)

### **Police action and criminal proceedings**

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

### **Proprietor and Directors**

If an allegation is made against a Proprietor or Director, schools should follow their own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

### **Allegations involving physical contact**





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Head teachers, Proprietors and Directors will be aware that for some teachers, for example music and PE teachers, physical contact with a pupil is unavoidable and necessary in order to teach the subject. Guidance on this is available in the schools safeguarding and child protection model policy available at: <https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

Further, teachers can use reasonable force in order to control or restrain a pupil in specific circumstances. Schools should refer to Camden's guidance on the use of physical restraint and intervention available at:

<https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

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

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

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

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

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

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

The following alternatives should be considered by the Headteacher and LADO before suspending a member of staff:

- ◆ redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;



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- ◆ providing an assistant to be present when the individual has contact with children;
- ◆ redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;
- ◆ moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- ◆ temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or where available, work for the local authority or academy trust.

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

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

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

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

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



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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.

**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 and to guard against any unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offense, or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

***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.

***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.***

### **Confidentiality and Information Sharing**

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

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



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

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

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

### Supporting those involved

#### Staff

As employers, schools must also ensure that all staff against whom an allegation has been made are treated fairly, that they are kept informed of the progress of any investigation or disciplinary process and that they receive support.

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

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

A copy of the CSCP information leaflet “Allegations against staff – what happens next?” should be provided to the member of staff. The leaflet is available at;

<https://cscp.org.uk/wp-content/uploads/2019/06/Allegations-against-staff-what-happens-next.pdf>

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



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The school will also ensure that the staff member gains access to counselling or medical advice where appropriate.

### **Children and parents**

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

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

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

### **Supply teachers**

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

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

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

### **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



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abuse. Advice can be sought from the Duty Officer at social services to decide how this will be done and by whom.

### Unfounded or malicious allegations

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

### Return to work

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

### Resignations

Full investigations into allegations must proceed even if the person involved resigns as it is important that the matter is properly dealt with and that a resolution or conclusion is reached and appropriate action taken.

It is important to decide whether allegations are substantiated and what further action may have to be taken to safeguard children through referral to the Disclosure and Barring Service and the Teaching Regulations Agency even if the staff member involved has left the school.

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

Wherever possible the accused will be given the full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible



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to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

### Records and references

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- ◆ a clear and comprehensive summary of the allegation;
- ◆ details of how the allegation was followed up and resolved;
- ◆ a note of any action taken, and decisions reached and the outcome as categorised above;
- ◆ a copy provided to the person concerned, where agreed by children's social care or the police; and,
- ◆ a declaration on whether the information will be referred to in any future reference.

It is important that records show clearly how a resolution to the allegation was reached and that this information is available when references are being written or information sought from future employers.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.



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

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

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

### 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.

### Section Two: Concerns that do not meet the harms threshold:

Proprietors/Directors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

### Low Level Concerns

As part of our whole school approach to safeguarding, we ensure to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented





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correctly, this should encourage an open and transparent culture; enable schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

### What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- ◆ is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- ◆ does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- ◆ being over friendly with children;
- ◆ having favourites;
- ◆ taking photographs of children on their mobile phone;
- ◆ engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- ◆ using inappropriate sexualised, intimidating or offensive language.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings.

### Sharing low level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Headteacher. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Schools should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.



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### Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Schools and colleges can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

### References

Schools should only provide substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

### Responding to low-level concerns

The school will respond to reports of low-level concerns. If the concern has been raised via a third party, the Headteacher will collect as much evidence as possible by speaking:

- ◆ directly to the person who raised the concern, unless it has been raised anonymously;
- ◆ to the individual involved and any witnesses

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.



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### Appendix 9

#### **Designated Safeguarding Lead Job Description:**

The Proprietor/Directors should ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

This designated safeguarding lead should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

#### **Deputy Designated Safeguarding Leads**

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.



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### Availability

During term time the designated safeguarding lead (or a deputy) is always available (during school hours) for staff in the school to discuss any safeguarding concerns. The designated safeguarding lead is also available out of hours/out of term activities and can be contacted via email or telephone, both of which are shared with staff at the start of term and appropriate cover is provided.

### Manage Referrals

The designated safeguarding lead is expected to refer cases:

- ◆ suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- ◆ to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- ◆ where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- ◆ where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.

### Working with others

The designated safeguarding lead is expected to:

- ◆ act as a source of support, advice and expertise for all staff;
- ◆ act as a point of contact with the safeguarding partners;
- ◆ liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
- ◆ keep the head teacher, senior leadership team and the Proprietor/Directors should be informed of on-going safeguarding and child protection issues and enquiries;
- ◆ liaise with the Headteacher to inform her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for



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children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

- ◆ as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- ◆ liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEND in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- ◆ liaise with the senior mental health lead, where safeguarding concerns are linked to mental health;
- ◆ promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- ◆ ensure all staff, including temporary staff, are aware of and understand policies and procedures and are to implement them through robust induction processes;
- ◆ work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school or college.

This includes:

- ◆ ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- ◆ support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social



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care intervention has ended, there is still a lasting impact on children's educational outcomes.

### Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- ◆ a clear and comprehensive summary of the concern;
- ◆ details of how the concern was followed up and resolved;
- ◆ a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part 1 and 2 of the guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators SENCOs or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### Raising Awareness

The designated safeguarding lead should:



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- ◆ ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;
- ◆ ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with our Proprietor and Directors regarding this;
- ◆ ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this;
- ◆ link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- ◆ help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.
- ◆ liaise with the Camden Virtual School Head in order to meet the educational needs of children known to CSSW;

### Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- ◆ understand the assessment process for providing early help assessment and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- ◆ have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and



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be able to attend and contribute to these effectively when required to do so;

- ◆ understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children;
- ◆ understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- ◆ are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- ◆ understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- ◆ understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- ◆ are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- ◆ can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- ◆ obtain access to resources and attend any relevant or refresher training courses; and,
- ◆ encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.





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### Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ◆ ensure that staff are supported during the referrals processes; and
- ◆ support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- ◆ encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- ◆ understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### Holding and sharing information

- ◆ The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of Keeping Children Safe in Education, and therefore the designated safeguarding lead should be equipped to:
- ◆ understand the importance of information sharing, both within the school, and with other schools on transfer including in-year and between primary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- ◆ understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- ◆ be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.



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### Policy Agreement Sign-off Sheet

I have carefully read and understood 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: .....