



**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*)**

CHILD PROTECTION (SAFEGUARDING) POLICY .....	1
Purpose of Policy .....	4
Key Contacts .....	5
School .....	5
London Borough of Camden .....	5
Roles and Responsibilities .....	7
Camden Supporting People Directorate/Children Safeguarding and Social Work Division (CSFH) .....	7
The Directors & Safeguarding Advisor .....	7
The Headteacher, Senior Leadership Team and Training Procedures .....	11
Role of the Designated Safeguarding Lead – Maria Adela Fojo Nebril .....	13
Working with Parents and Carers .....	13
Multi-agency Working .....	13
Contacting the Police .....	14
Safeguarding Children .....	14
Early Help Assessment .....	15
Referral for a statutory social work service .....	17
Role of School .....	18
Recognition and Responsibility .....	18
Dealing with Disclosures .....	19
Referral .....	20
Attendance at case conferences and core groups .....	21
Monitoring .....	21
Records .....	22
Confidentiality and information sharing .....	22

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**THE MULBERRY HOUSE  
SCHOOL**

<b>Early Years.....</b>	<b>24</b>
Legal and policy framework.....	24
Safeguarding and Child Protection.....	24
Suitable people.....	25
Staff training, skills and supervision.....	26
Staff ratios .....	26
Health.....	27
Health and safety, risk assessments and suitability of premises.....	27
Behaviour management, physical intervention and restraint.....	28
Conduct and safe teaching practice.....	29
Providing intimate or personal care to pupils.....	30
Whistleblowing.....	30
Working with aggressive and violent parents.....	31
Site security and visitors .....	31
Use of The Mulberry House School premises by other organisations.....	32
Monitoring and review.....	33
<b>Children Missing or Absent from Education (CME), Attendance and Punctuation Policy..</b>	<b>34</b>
Children who are missing or absent from education or home educated.....	34
Please see Appendix 10 for important instructions to staff on completing the registers....	35
Punctuality.....	36
Non-collection of children from school (see Uncollected Child Policy) .....	36
Illness, medical and dental appointments.....	36
Extended holidays & overseas visits.....	37
Responsibility of the Headteacher.....	37
Responsibility of the Parents .....	37
<b>Children who harm other children (child on child abuse).....</b>	<b>38</b>
Harmful Sexual Behaviour and Serious Violence and Harassment.....	39
Procedures.....	41
Mental Health.....	45
Prevention of radicalisation into terrorism .....	46
<b>Mandatory reporting of Female Genital Mutilation (FGM).....</b>	<b>47</b>

Last reviewed: Sep-25



**THE MULBERRY HOUSE  
SCHOOL**

<b>Online Safety.....</b>	<b>48</b>
<b>Relationships and Health Education.....</b>	<b>49</b>
<b>Looked after and previously looked after children and care leavers .....</b>	<b>49</b>
<b>Children with special educational needs or disabilities (SEND) .....</b>	<b>49</b>
<b>Safeguarding vulnerable groups .....</b>	<b>49</b>
<b>Contextual safeguarding and extra-familial harm.....</b>	<b>52</b>



## THE MULBERRY HOUSE SCHOOL

### 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 meet our statutory duties under Section 175 of the Education Act 2002, *Keeping Children Safe in Education* (September 2024), *Relationships Education, Relationships and Sex Education (RSE) and Health Education, 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* (2023), including *Information Sharing* (2018), guidance on 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; please refer to our Safer Recruitment Policy for further details.

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 \(2015\)](#)

[Keeping Children Safe in Education 2024](#)

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



## THE MULBERRY HOUSE SCHOOL

### Key Contacts

#### School

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

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

**Name:** Cari & Duncan Binet-Fauvel

**Contact details:** 020 8452 7340 or 07534555063

**Headteacher:** Erika Billmore

**Contact details:** 020 8452 7340

**Safeguarding Advisor:** Ken Adams

**Contact details:** 0208 452 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:** Erika Billmore (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:** Chloe Lincoln (Class Teacher, QTS)

**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

Last reviewed: Sep-25



## THE MULBERRY HOUSE SCHOOL

Metropolitan Police Service. The school will operate safeguarding procedures in line with locally-agreed inter-agency procedures.

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

**Name:** Kurt Ferdinand  
**Contact:** 0207 974 6481

### **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:** Esther Fajoye (Service Manager)  
**Contact:** 0207 974 1485

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

**Name:** Gemma Brown (Service Manager)  
**Contact:** 07796937743

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

**Contact:** Tracey Murphy  
**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)

### **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**

Last reviewed: Sep-25

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## THE MULBERRY HOUSE SCHOOL

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.

### **Roles and Responsibilities**

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

The Directorate includes the Children's Safeguarding and Social Work (CSFH), 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 Directors & Safeguarding Advisor**

- ◆ The Directors (Cari and Duncan Binet-Fauvel) and Safeguarding Advisor (Ken Adams), 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 Directors (Cari and Duncan Binet-Fauvel) and Safeguarding Advisor (Ken Adams), 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 Directors will take overall responsibility for liaising with Camden CSFH on safeguarding and child protection matters and link with the LADO in the event of an allegation against the Headteacher.



## THE MULBERRY HOUSE SCHOOL

The Directors and Safeguarding Advisor 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.
- ◆ 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 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 DDSLs 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;
- ◆ Providing help and support to meet the needs of children as soon as problems emerge;
- ◆ Protecting children from maltreatment; whether that is within or outside the home, including online;
- ◆ Preventing the impairment of children's mental and physical health or development
- ◆ Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- ◆ Taking action to enable all children to have the best outcomes
- ◆ 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:



## THE MULBERRY HOUSE SCHOOL

- ❖ 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 training, 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 whistleblowing procedures.
- ❖ A staff behaviour policy (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.
- ❖ 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 whistleblowing is always emphasised and a copy of our whistleblowing 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.



## THE MULBERRY HOUSE SCHOOL

- ◆ Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection polices and the staff code of conduct policy and annually thereafter.
- ◆ The 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 PSHE in line with the Education for a Connected World Framework as well as the DfE's guidance on [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 2024) 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 and Directors in line with statutory guidance and the Local 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 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 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.



## THE MULBERRY HOUSE SCHOOL

- ◆ 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 over-ride those wishes if it is in the best interests of the child.

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

The Senior Deputy 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 (Senior Deputy Headteacher), and the Deputy DSLs, Erika Billmore (Headteacher), Hemisha Varsani (SLT) and Chloe Lincoln (Class teacher), 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 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.

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## THE MULBERRY HOUSE SCHOOL

- ◆ 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, whistleblowing policy, online safety policy, the latest version (2024) 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.
- ◆ All staff are aware of their role and responsibilities for safeguarding under Part 1 of the guidance **Keeping Children Safe in Education (2024)**.
- ◆ The Headteacher will keep a central record of all statutory and other training undertaken by staff members, the 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 CSFH.
- ◆ 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 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 Directors immediately and these are also discussed at termly meetings and provided within the Director's termly report. A written safeguarding report and an updated policy is also given to the directors 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 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 MULBERRY HOUSE SCHOOL

- ◆ The school offers a safe environment for staff and pupils to learn.

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

See the Role of the DSL – [Appendix 9](#), their Job Description can be made available on request from the school office.

### Working with Parents and Carers

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

#### The school will:

- ◆ Make parents aware of our statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary. 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 2023 and Keeping Children Safe in Education (KCSIE) 2024.

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 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](#).



## THE MULBERRY HOUSE SCHOOL

### 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;

- ◆ Providing help and support to meet the needs of children as soon as problems emerge
- ◆ protecting children from maltreatment, whether that is within or outside the home, including online
- ◆ preventing impairment of children's health or development
- ◆ ensure children are growing up in circumstances consistent with the provision of safe and effective care;
- ◆ taking action to enable all children to have the best outcomes.

*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 CSFH
- ◆ 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](#) 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.

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.



## THE MULBERRY HOUSE SCHOOL

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.

### **Operation Encompass**

**Policy Statement** The Mulberry House School is registered with **Operation Encompass**, a national initiative that enables police to share information with schools about domestic abuse incidents involving children.

#### **Implementation:**

- ◆ The DSL is the designated Key Adult
- ◆ Notifications are received before the next school day
- ◆ Support is offered discreetly and sensitively
- ◆ Records are kept securely in accordance with GDPR

### **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, DDSLs 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 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;
- ◆ Children who have experienced multiple suspensions, us at risk of being permanently excluded from schools, colleges and in alternative provision or a Pupil Referral Unit;
- ◆ children who are misusing drugs or alcohol;
- ◆ children at risk of exploitation through modern slavery, trafficking;
- ◆ children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;



## THE MULBERRY HOUSE SCHOOL

- ◆ children who have returned home from care;
- ◆ children who show early signs of abuse or neglect;
- ◆ children at risk of radicalisation into terrorism;
- ◆ children at risk from so-called 'honour' based abuse ie: FGM, forced marriage;
- ◆ children who have a parent or carer in custody, or who are affected by parental offending;
- ◆ Is frequently missing/goes missing from education, home or care;
- ◆ 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 exploitation 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 support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.



## THE MULBERRY HOUSE SCHOOL

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 CSFH 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 designated safeguarding lead or their deputy as they are most likely to have the most complete safeguarding overview. Following consultation the designated safeguarding lead should decide on whether to make a referral to CSFH via the Contact Service.

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

The Contact Service will inform the school/college within 1 working day of the outcome of any referral and what action CSFH 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).



## THE MULBERRY HOUSE SCHOOL

Child protection referrals can be made by phone or an e-CAF to the CSFH 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 \(DfE 2023\)](#)
- ◆ [Information Sharing \(DfE 2024\)](#)
- ◆ [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 \(DfE 2024\)](#)

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

- ◆ identify those pupils where there are child protection concerns and make a referral to CSFH
- ◆ 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/OFSTED. Where required, advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.



## THE MULBERRY HOUSE SCHOOL

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.

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 exploitation, radicalisation into terrorism, 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;
- ◆ allow the child to talk freely;
- ◆ reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to CSFH;
- ◆ reassure the child that what has happened is not their fault and that they were right to tell someone;
- ◆ not ask direct questions but allow the child to tell their story;
- ◆ not criticise the alleged perpetrator;
- ◆ explain what will happen next and who has to be told;
- ◆ make a formal record and pass this on to the designated safeguarding lead.

### Low-Level Concerns

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

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

**Policy Statement** The Mulberry House School is committed to creating a culture in which all concerns about adults working in or on behalf of the school (including supply staff, volunteers, and contractors) are shared responsibly and with the right person, recorded and dealt with appropriately.

**Definition** A low-level concern is any concern—no matter how small—that an adult may have acted in a way that is inconsistent with the staff code of conduct but does not meet the threshold for serious harm.

**Examples include:**

- Being overly friendly with pupils
- Having favourites
- Using personal devices to photograph children
- Humiliating pupils
- Spending time alone with a child in a secluded area

**Reporting Procedure** All staff are encouraged to report low-level concerns to the Headteacher and DSL. These will be recorded confidentially and reviewed regularly to identify patterns or escalation risks. The policy aligns with guidance from the NSPCC Learning.

### Referral

A referral will always be made to the CSFH by the DSL or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and any member of staff may make a referral if this is necessary 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.



## THE MULBERRY HOUSE SCHOOL

If the child already has an allocated CSFH social worker, the referral should be made directly to them. If the child is not already known to CSFH, 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 CSFH/Early help services via the DSL.

### Attendance at case conferences and core groups

The DSL will liaise with CSFH to ensure that all relevant information held by the school is provided to CSFH 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;

- ◆ 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.



## THE MULBERRY HOUSE SCHOOL

### 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.

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 CSFH and parents refuse consent or seeking consent would place the child at further risk.



## THE MULBERRY HOUSE SCHOOL

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

Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues; otherwise consent should be sought from parents.

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

Schools 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.



## THE MULBERRY HOUSE SCHOOL

### 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 Directors will notify Ofsted within 14 days.

The 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.

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

- ❖ 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 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.



## THE MULBERRY HOUSE SCHOOL

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.

### 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 keyworker 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 20 pupils
- ◆ there will be at least one member of staff for every 4 children

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

- ◆ 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 20 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)
- ◆ 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 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](#). 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**

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

**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.

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](#).



## THE MULBERRY HOUSE SCHOOL

*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 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**.



## THE MULBERRY HOUSE SCHOOL

### 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.
- ◆ 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**

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

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 CSFH 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 CSFH.

If there are high levels of risk involved in contact with parents, CSFH 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 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 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;

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

- ◆ 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, 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 MHS 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 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://assets.publishing.service.gov.uk/media/5fcf72fad3bf7f5d0a67ace7/alternative\\_provision\\_statutory\\_guidance\\_accessible.pdf](https://assets.publishing.service.gov.uk/media/5fcf72fad3bf7f5d0a67ace7/alternative_provision_statutory_guidance_accessible.pdf)

[https://assets.publishing.service.gov.uk/media/657995f0254aaa000d050bff/Arranging\\_education\\_for\\_children\\_who\\_cannot\\_attend\\_school\\_because\\_of\\_health\\_needs.pdf](https://assets.publishing.service.gov.uk/media/657995f0254aaa000d050bff/Arranging_education_for_children_who_cannot_attend_school_because_of_health_needs.pdf)

### 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 Directors will ensure:



## THE MULBERRY HOUSE SCHOOL

- ◆ the organisation provides an overview of what it intends to teach so that the 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 Prevent Education officer (020 7974 1008)
  - ❖ 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.
- ◆ 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 and Directors will ensure that:

- ◆ all school policies are regularly monitored by the DSL and annually reviewed by the Headteacher 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 Directors;

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

- ◆ the designated safeguarding lead ensures a high standard of recording of all concerns held about children;
- ◆ 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 Directors to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

### **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:*

[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 (CSFH), their allocated social worker should be notified immediately.



## THE MULBERRY HOUSE SCHOOL

- ◆ If the child is not known to CSFH, but The Mulberry House School has concerns about their welfare, the designated safeguarding lead should make a referral to CSFH.

### 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.

Please see [Appendix 10](#) for important instructions to staff on completing the registers.

### 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 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.



## THE MULBERRY HOUSE SCHOOL

### 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 the office and/or the float teacher 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.

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 (CSFH), their allocated social worker should be notified immediately.
- ◆ If the child is not known to CSFH, but The Mulberry House School has concerns about their welfare, the designated safeguarding lead should make a referral to CSFH.

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.

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

### 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.



## THE MULBERRY HOUSE SCHOOL

### 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.

### 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 management system.

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

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

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.

### **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.

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.

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. 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.

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

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

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.

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



## THE MULBERRY HOUSE SCHOOL

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 work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.

- ◆ 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 CSFH.
- ◆ The school will ensure that staff, the 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.

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

- ◆ 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 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 2024. 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



## THE MULBERRY HOUSE SCHOOL

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, CSFH or the police, or managing the matter internally under school behaviour policies.
- ◆ Where a referral will be made to CSFH 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 CSFH 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.

### 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.



## THE MULBERRY HOUSE SCHOOL

- ◆ 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).
- ◆ 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.

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

- ◆ 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).

### 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

Last reviewed: Sep-25

Reviewed by: MAFN/EB/CBF/DBF

Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

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).

### 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 exploitation, 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



## THE MULBERRY HOUSE SCHOOL

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.

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 into terrorism

The DSL and DDSLs have undertaken training on how to identify, children, young people and staff who are at risk of radicalisation into terrorism. The school will assess the risk of children being drawn into terrorism, and who may be at risk of radicalisation into terrorism. All staff also receive channel awareness and prevent training annually to enable them to identify children at risk of radicalisation into terrorism. 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](#).

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 into terrorism, 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



## THE MULBERRY HOUSE SCHOOL

an integral part of the school's computing curriculum as well as PSHE and Relationships and Health 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.

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:

- ◆ 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](#).



## THE MULBERRY HOUSE SCHOOL

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](#).

### The 4 Cs

**Policy Statement** The school recognises the importance of safeguarding children from online risks and adopts the 4 Cs framework:

Risk Type	Description
Content	Exposure to harmful material (e.g. pornography, hate speech, misinformation)
Contact	Harmful interactions with others (e.g. grooming, coercion)
Conduct	Risk from a child's own behaviour (e.g. sexting, cyberbullying)
Commerce	Financial risks (e.g. scams, gambling, phishing)

### Implementation

- Age-appropriate digital literacy education
- Filtering and monitoring systems
- Staff training on emerging online threats
- Clear reporting routes for pupils and parents

### AI-Related Safeguarding Risks

**Policy Statement** The school acknowledges the growing use of AI tools and the potential safeguarding risks they pose, including misinformation, deepfakes, and inappropriate content generation.

### Safeguarding Measures:

- Only school-approved AI tools may be used (with integrated safety features)
- Staff are prohibited from inputting any personal or sensitive data into AI systems
- Any AI-generated content must be fact-checked before use
- Pupils are educated on ethical AI use and digital critical thinking
- The DSL and eSafety officer oversee any AI-related safeguarding incidents

Last reviewed: Sep-25

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Next review: Sep-26

## Relationships 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 and Health Guidance.

## 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

## 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.

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, CSFH or other agencies in order to overcome problems or keep them safe.



## THE MULBERRY HOUSE SCHOOL

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 CSFH 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.

CSFH 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 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](https://www.gov.uk/government/publications/forced-marriage-detailed-guidance)

### ***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.*

Last reviewed: Sep-25

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Next review: Sep-26



## THE MULBERRY HOUSE SCHOOL

### *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, bisexual, or gender questioning and 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 will provide safe spaces and opportunities for LGBT pupils to raise concerns and will ensure that LBGT inclusion is part of the Relationships and Health curriculum.

- ◆ A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
- ◆ However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.
- ◆ It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- ◆ As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.
- ◆ Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Last reviewed: Sep-25



## THE MULBERRY HOUSE SCHOOL

### 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. 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*



## THE MULBERRY HOUSE SCHOOL

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

*Exploitation is a form of abuse involving an imbalance of power within a relationship that allows one party to use this power to manipulate another to carry out an act. The victim may believe that they are acting on their own accord but in fact their consent has been obtained through deception, duress or force and threats of violence. 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. It may also involve an exchange for something the victim wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.*

*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. The 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 MULBERRY HOUSE SCHOOL

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

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

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 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.

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

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

The school/college will take account of the government guidance [Mental health and behaviour in schools](#).

### **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.*

### **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.*



## THE MULBERRY HOUSE SCHOOL

### *Additional DfE policies and guidance*

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

### Alternative Provision

### Attendance

### Anti-discrimination & harassment

### Child sexual exploitation

### Behaviour and discipline

### Bullying (including cyberbullying)

### Children missing from school

### Exclusion of pupils

### Fabricated or induced illness

### Faith Abuse

### Gangs and Youth violence

### Health and safety

### Supporting children with medical conditions

### Mental Health

### Physical intervention

[Promoting fundamental British values through SMSC - Publications - GOV.UK](http://Promoting fundamental British values through SMSC - Publications - GOV.UK)

[Keeping children safe in education - Publications - GOV.UK](http://Keeping children safe in education - Publications - GOV.UK)

### RSHE

### Sexting

### *Additional School 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. Pupil behaviour policy

Last reviewed: Sep-25

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## THE MULBERRY HOUSE SCHOOL

### 1.8. 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.

#### ***Additional school policies, procedures & appendices***

Risk assessments	<a href="#"><u>Appendix 1 – Actions where there are concerns about a child</u></a>
Uncollected child procedure	<a href="#"><u>Appendix 2 – Definitions &amp; Indicators</u></a>
Sick child procedure	<a href="#"><u>Appendix 3 – Safeguarding Monitoring Form</u></a>
Emergency accident procedure	<a href="#"><u>Appendix 4 – Legal Duties</u></a>
Health and Safety policy	<a href="#"><u>Appendix 5 – Single Central Register</u></a>
The Staff Handbook	<a href="#"><u>Appendix 6 – Safeguards for New Staff</u></a>
Confidentiality Policy	<a href="#"><u>Appendix 7 – Intimate Care &amp; Nappy Changing</u></a>
The Management of Medicines Policy	<a href="#"><u>Appendix 8 – Managing Allegations (including low level concerns)</u></a>
Supervision policy	<a href="#"><u>Appendix 9 – The Role of the Designated Safeguarding Lead</u></a>
SEND policy	<a href="#"><u>Appendix 10 – Completing Registers</u></a>
EAL policy	<a href="#"><u>Statement of Intent – Health and Safety</u></a>
Attendance and Punctuality policy	

#### ***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: .....

Sep-25  
BF/DBF  
Sep-26