



Children, Schools and Families

**Model safeguarding and child
protection policy for schools and
colleges in Camden**



**St Aloysius
Catholic Primary**

September 2018

Nb Updates to the previous policy are indicated in red

CONTENTS

	Page
Key contacts	1
PART A – CORE OPERATIONAL AND POLICIES	
1 Purpose of policy	2
2 Roles and responsibilities	2
3 Safeguarding children	8
4 Child protection procedures	10
5 Early years settings in schools	16
6 Safer recruitment	20
7 Staff practice and conduct	26
8 Health and safety/risk assessment	32
PART B – ADDITIONAL SAFEGUARDING POLICIES	
B1 Non collection of children	35
B2 Missing from education and home educated	37
B3 Peer on peer abuse	37
B4 Harmful sexual behaviour	38
B5 Prevention of radicalisation	41
B6 Mandatory reporting of FGM	42
B7 Online safety	42
B8 Looked after children and care leavers	42
B9 Children with SEND	43
B10 Safeguarding vulnerable groups	43
B11 Contextual safeguarding for young people	44
B12 Other relevant policies	45
Appendix 1: Child Protection Definitions and Indicators	47
Appendix 2: Safeguarding children monitoring/incident form	48
Appendix 3: Schools central checks record	49
Appendix 4: School’s safeguarding checklist	51

Please note: italicised font within the model policy indicates where schools/colleges need to insert their own local policy.

Key contacts

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Designated safeguarding lead:

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Part A: Core operational policies and procedures

1 Purpose of policy

This policy sets out how the school/college will meet its statutory duty under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and help them to achieve good outcomes. The school/college will achieve this by providing a safe learning environment and ensuring school staff have the skills and knowledge to take action where children need extra support from early help services or require a social work service because they are in need or need to be protected from harm.

2 Roles and responsibilities

2.1 Camden Supporting People Directorate

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The Directorate includes Children's Safeguarding and Social Work (CSSW), Early Intervention and Prevention and Education divisions and these services will support the school/college 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/college with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

2.2 Governing body

The governing body will ensure that the school/college meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

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

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- a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
- a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- There is a nominated governor with responsibility for liaising with Camden CSF on safeguarding and child protection matters and who links with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school/college and there are robust whistleblowing procedures in place.

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- Steps are taken to ensure parents and pupils are aware of the school/college's safeguarding and child protection policies and procedures.
- Governors take steps to ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The school/college has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least 1 member of the governing body has undertaken accredited safer recruitment training.
- All staff receive safeguarding and child protection training at least every 2 years and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation.
- The school/college has procedures in place to deal with allegations made against other pupils.
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

2.3 Schools and head teachers/principals

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

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- Staff are inducted thoroughly and have read all the school/colleges' safeguarding and child protection policies, **behaviour policies and the CSCB children missing from education policy** so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals to CSSW.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The school/college offers a safe environment for staff and pupils to learn.
- Safeguarding issues are brought to the attention of the governing body.

2.4 Role of the designated safeguarding lead

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

Additional procedures

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Information about the designated safeguarding lead on duty is displayed at the front office on both sites so everyone knows which designated safeguarding lead is on duty. The poster indicates who else can be spoken to if that member of staff is not immediately available.

The designated safeguarding lead (and their deputy) will:

- liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
- keep the head teacher/principal and the board of governors informed of on-going safeguarding and child protection issues and enquiries;
- provide advice and guidance for staff on safeguarding and child protection issues and making referrals ;
- ensure the school's safeguarding and child protection policies are up to date and consistent with Camden's Safeguarding Children Board policies and that policies are reviewed annually;
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them;
- attend regular training, **including Prevent awareness training**, and the designated teachers meetings hosted by Camden in order to keep up to date with new policy, emerging issues and local **early help**, safeguarding and child protection procedures and working practices;

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- provide regular updates received from Camden to all staff members and governors on any changes in safeguarding or child protection legislation (updated information will be provided by Camden at the designated teachers meeting and safeguarding trainers via 6 weekly bulletins; designated safeguarding leads will be responsible for communicating this information to staff immediately; they may decide to hold workshops or discuss in staff meetings);
- have an awareness of those children who may be in need, young carers and children who have special educational needs **and liaise with the SENCO when considering any safeguarding action for a child with special needs;**
- **liaise with the designated teacher for LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child;**
- oversee child protection systems within the school/college, including the management of records, standards of recording concerns and referral processes;
- provide a link between the school/college and other agencies, particularly CSSW and the Camden Safeguarding Children Board;
- ensure staff , including temporary staff, receive appropriate safeguarding and child protection training every 2 years;
- ensure parents are fully aware of the school/college policies and procedures and that they are kept informed and involved;
- ensure relevant records are passed on appropriately when children transfer to other schools **and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer.**

2.5 Working with parents and carers

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

The school/college will:

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

Additional procedures

Parent workshops are held throughout the year to keep parents informed and essential information is shared with them in the newsletter. We are aware of the additional guidance available from the DfE on dealing with issues around parental responsibility:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/489901/Parental_Responsibility_Advice_for_School_January_2016.pdf

2.6 Multi-agency working

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

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

3 Safeguarding children

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

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.

The school/college will refer to Camden's thresholds and eligibility criteria (available at the link below) to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

[Safeguarding children - Camden Council](#)

Model safeguarding and child protection policy for schools and colleges in Camden

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

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

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

3.1 Early help cases

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

- children with disabilities and additional needs, including those with special educational needs
- young carers
- children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime;
- children who frequently go missing from home, school or care;
- children who are misusing drugs or alcohol;
- children at risk of exploitation through modern slavery and trafficking;
- children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
- children who have returned home from care;

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- children who show early signs of abuse or neglect;
 - children at risk of radicalisation;
 - privately fostered children.
- Where the child's extra needs require services, consideration will be given to what early help support can be offered a child by the school/college.
- If the child requires an early help service from another agency, the school/college will make a referral to the Early Help service (via the Child and Family Contact team) for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.
- Where the child is receiving an Early Help service, the school/college will work as part of the Team around the Child and take up the role of lead professional where this is appropriate.
- Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school/college believes that this is not the case, consideration should be given making a referral for a statutory social work service.

3.2 Referral for a statutory social work service

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputy 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 CSSW via the Contact Service.

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

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

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

4 Child protection procedures

4.1 Role of school/college

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

- Working together to safeguard children (*DfE 2018*)
[link](#)
- What to do if you're worried a child is being abused (*DfE2015*)
[What to do if you're worried a child is being abused - Publications - GOV.UK](#)
- The London Safeguarding Children Board child protection procedures
[London Safeguarding Children Board: Child Protection Procedures](#)

Model safeguarding and child protection policy for schools and colleges in Camden

- Keeping children safe in education (*DFE 2018*)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/707761/Keeping_Children_Safe_in_Education_-_September_2018.pdf

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

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

4.2 Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- Staff should refer to appendix 1 for a full definition of significant harm and the specific indicators that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. **Where required, advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.**

- Concerns may be monitored over time and recorded on the monitoring/incident form shown at appendix 2. Details of any concerning incidents should also be recorded on this form.

4.3 Dealing with disclosures

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

- listen to what is said without displaying shock or disbelief and accept what the child is saying;
- allow the child to talk freely;
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to CSSW;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- not ask direct 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.

4.4 Referral

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

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- Referrals should be in writing using an e-CAF referral completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the e-CAF referral within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a “no names” basis with the Child and Family Contact team social worker to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.
- If the child already has an allocated CSSW social worker, the referral should be made directly to them. If the child is not already known to CSSW, referrals should be made to the Child and Family Contact team. If the child lives outside Camden, a referral should be made to their home local authority.
- All referrals will be acknowledged by the Child and Family Contact team manager within 24 hours and the referrer informed of what action will be taken.
- If the school/college does not think the child’s situation is improving within a reasonable timescale following referral, this should be taken up with CSSW/Early help services via the designated safeguarding lead.

4.5 Attendance at case conferences and core groups

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

4.6 Monitoring

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

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead;
- all information will be recorded on the child protection monitoring/incident form shown at appendix 2 prior to each conference and core group meeting;
- the completed monitoring form will be kept on the pupil's separate child protection file (that should be separate from the school record) and copies made available to all conferences and core group meetings;

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- the designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

4.7 Records

- Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the school/college.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on the safeguarding monitoring/incident form (see appendix 2) and all records should be signed and dated.
- Records should show:
 - what the concerns were;
 - what action was taken to refer on concerns or manage risk within the school/college;
 - 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;

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- whenever concerns arise or there is a serious incident **or**
 - where a child is being monitored, prior to a case conference or core group meeting.
- Where a child who is subject to a child protection plan transfers to another school, the designated safeguarding lead is responsible for ensuring that copies of all relevant records are passed to the designated safeguarding lead at the new school.
- Child protection records will only be kept until the pupil leaves the school/college and should be disposed of as confidential waste.

4.8 Confidentiality and information sharing

- All information obtained by school/college staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act; otherwise consent should be sought from parents.
- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with CSSW and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by CSSW.
- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents made aware of this. Before taking this step, schools and colleges should consider the proportionality of disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?

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- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the 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/college’s duty to share information.
- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the Child and Family Contact team social worker.

5 Early Years settings within schools

This section relates only to primary schools with nurseries and/or reception classes

5.1 Legal and policy framework

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

guidance.https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/596629/EYFS_STATUTORY_FRAMEWORK_2017.pdf

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

5.2 Safeguarding and child protection

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

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

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

Model safeguarding and child protection policy for schools and colleges in Camden

- staff do not bring personal mobile phones into the early years setting and use them only during breaks in the staff room.
- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting.

5.3 Suitable people

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

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

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Camden policy "*Guidance of the management of an allegation against a member of staff*" as referred to in section 6 of this document.

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

5.4 Staff training, skills and supervision

The school will ensure that:

Model safeguarding and child protection policy for schools and colleges in Camden

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

5.5 Staff ratios

The school will ensure that:

- staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe;
- parents are kept informed of staff members and numbers;

Model safeguarding and child protection policy for schools and colleges in Camden

- children are kept within staff sight and hearing at all times.

For nursery classes:

- there will be at least one member of staff for every 13 children
- one member of staff will be a qualified teacher
- at least one member of staff will hold a full and relevant level 3 qualification.

For reception classes:

- class sizes will be limited to 30 pupils
- classes will be lead by a qualified teacher supported by suitably qualified support staff.

For before and after school provision, schools will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

5.6 Health

The school will:

- promote the health of children attending the early years provision
- take necessary steps to stop the spread of infection
- administer medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner

Model safeguarding and child protection policy for schools and colleges in Camden

- notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days.

5.7 Health and safety and suitability of premises

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

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

Additional procedures

St Aloysius has a separate Health and Safety Policy which relates to premises.

5.8 Managing behaviour

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

6 Safer recruitment

6.1 General principles

Model safeguarding and child protection policy for schools and colleges in Camden

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

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

- The school/college will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors **and those involved in the management of an independent school**, in accordance with statutory requirements.
- No staff member, volunteer, governor **or anyone involved in the management of an independent school** will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed.
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school (see section 6.4).
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.
- Staff and governors who normally sit on interview panels will be trained in safeguarding interviewing techniques and no interview should go ahead unless at least one member of the panel has undertaken safer recruitment training. Schools will take up the accredited safer recruitment training offered through the Camden Safeguarding Children Board or any other accredited training provider.

Model safeguarding and child protection policy for schools and colleges in Camden

- Although the head teacher/principal will have day-to-day responsibility for the recruitment of staff, the board of governors will ensure that they maintain an overview of recruitment systems in order to scrutinise practise and ensure all statutory checks are carried out.
- School and Human Resources staff with responsibility for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- In schools, the head teacher/principal will be responsible for keeping a single central record of all staff and volunteers who work at the school.
- In colleges, the principal will be responsible for keeping a single central record of all staff that provides education to children.
- The single central records should include details of all checks carried out and the outcome of these checks **or any certificates obtained** in the format shown at appendix 3.
- Where the school/college has salaried trainee teachers, the school/college will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.
- For trainee teachers that are fee-funded, the school will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children.
- Where staff are recruited via third parties such as employment agencies, the head teacher/principal and/or the board of governors will:

Model safeguarding and child protection policy for schools and colleges in Camden

- seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
- request written confirmation of the outcome of all checks
- request written confirmation that an enhanced DBS certificate has been received by the agency
- check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

6.2 Checks to be taken out

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

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided.
- The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked in the presence of the applicant.
- Where the applicant will be involved in regulated activity, an enhanced DBS check will be taken out, including information from the barred list. If the applicant will begin work before an enhanced DBS check can be completed, a barred list check will be obtained.
- In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on **TRA** Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order.
- For independent schools, free schools and academies, checks will be made to ensure any member of staff or governor involved in the management of the school is not barred from doing so under a section 128 direction.

Model safeguarding and child protection policy for schools and colleges in Camden

- Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.

Schools/colleges should be aware of the following central government guidance:
[Criminal records checks for overseas applicants - Publications - GOV.UK](#)
[Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK](#)

- Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role.
- The school/college will keep copies of the following documents on staff personnel files:
 - documents used as proof of identity such as passports or driving licences;
 - a summary of the DBS certificate (but all other documents relating to the DBS check must be destroyed);
 - documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).

6.3 References

- Applicants will be asked to provide a full employment history and details of at least 2 referees, including previous and recent employers, **and who should be a senior member of staff with the authority to provide references. References from colleagues will not be acceptable.**

Model safeguarding and child protection policy for schools and colleges in Camden

- All references will be taken up prior to interview and will be requested directly from the referee, **including references for internal candidates**. Referees will be contacted to resolve any issues that emerge from the references provided.
- **References will be taken up from current employers only; if the applicant is not currently employed, verification of will be sought from their previous school/college as to the dates the applicant was employed and the reasons for leaving the post.**
- **Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.**

6.4 DBS checks

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

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

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

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

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

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

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

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

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

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

6.5 Volunteers

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

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

Model safeguarding and child protection policy for schools and colleges in Camden

- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers will be fully inducted in relation to all school policies and procedures.

6.6 Governors and independent school management

The school will take out an enhanced DBS check on governors but a barred list check will only be taken out if the individual governor will be carrying out a regulated activity within the school.

The school will also take out a check with the Teaching Regulation Agency Teacher Services system to establish whether any individual seeking to become the governor of a maintained school or take up a position in the management of an independent school has been disqualified and therefore unable to do so.

Additional policies

Maintained schools, independent schools, academies and free schools should be aware of the need to take out checks on school management or trustees under section 128 of the Education and Skills Act to establish if the individual has been barred from being involved in the management of schools.

6.7 Alternative education provision

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

7 Staff practice and conduct

7.1 Induction and training

- The head teacher/principal will ensure that all staff are fully inducted, are made aware of the following policies of the school/college and that staff are fully aware of their role in implementing these:
 - Safeguarding and child protection policy and procedures
 - Behaviour policy
 - Staff code of conduct
 - Children missing from education policy.
- Staff will be asked to confirm in writing that they have received and read all relevant staff policies, including “*What to do if you are worried a child is being abused*” guidance.
- The designated safeguarding lead will ensure that all staff are fully inducted with regard to the school/college child protection procedures and that they receive safeguarding and child protection training on a two-yearly basis.
- The head teacher/principal will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
- School/college staff and governors will receive multi-agency safeguarding training provided by Camden Safeguarding Children Board at the relevant level.
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses provided by Camden SCB.

Model safeguarding and child protection policy for schools and colleges in Camden

- Schools/college staff will also receive training on the use of the Common Assessment Framework assessment and referral process as part of their safeguarding training.
- School/college staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation.

7.2 Conduct and safe teaching practice

- The school/college expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- The head teacher/principal will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the school/college expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- Staff and volunteers should be aware of current guidance on safe teaching practice contained in the DCSF “*Guidance for safer working practice for adults working with children & young people*” (2009).

<http://www.childrenengland.org.uk/upload/Guidance%20.pdf>

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

[Camden Essentials: HR model policies for schools](#)

7.3 Providing intimate or personal care to pupils

Staff in primary schools 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.

Schools must have a written policy in place in order to promote safe working practices for staff and ensure children's privacy. 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 any agreed school policy or practice when providing intimate or personal care.*
- *When taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen.*
- *Parents should always be notified if intimate care has been provided.*
- *When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated teacher.*
- *When children are changing, levels of supervision should be appropriate to the pupil's age.*
- *Staff should avoid any physical contact unless a child needs help.*
- *Staff should ensure that changing areas are private and that others are not able to enter whilst children are changing.*

7.4 Behaviour management, physical intervention and restraint

The school/college will put in place a behaviour management policy in line with government guidance and any use of physical intervention and restraint will be linked to the implementation of the school behaviour policy.

The school/college will use physical intervention and restraint only in line with Camden CSF policy "*Physical intervention policy for schools and centres*".

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

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

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.

7.5 Music tuition

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

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

- *ensure they behave in an appropriate manner and maintain professional boundaries at all times*
- *only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed*

Model safeguarding and child protection policy for schools and colleges in Camden

- *make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why*
- *ask the child's permission first and respect their wishes*
- *report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken*
- *never travel alone with children in a car*
- *seek permission from parents before contacting children by mobile phone, for instance to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable.*

The school/college should:

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

7.5 Allegations against staff

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

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

Model safeguarding and child protection policy for schools and colleges in Camden

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

All allegations in relation to staff members will be referred to the head teacher; allegations against the head teacher will be referred to the board of governors.

7.6 Whistleblowing

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

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

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools/colleges are failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the school/college, 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;
- The following numbers can be used where there are issues regarding the school/college’s overall procedures around safeguarding

Model safeguarding and child protection policy for schools and colleges in Camden

- Camden Council's confidential and independent help-line for protected disclosure on **0800 734199**
 - the Ofsted whistle-blowing line on **0300 123 3155**
 - the NSPCC whistleblowing helpline on **0800 028 0285**.
- The head teacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

Additional policies

Individual schools should record any additional procedures here or refer to any separate policies, which should cover the following areas:

- *Relationships with pupils/positions of power and trust for the purposes of the Sexual Offences Act 2003*
- *expected guidance on professional and personal standards of conduct and behaviour*
- *confidentiality*
- *duty of care*
- *contact and communications with pupils and parents, including appropriate physical contact, home visits, email and other electronic communications*
- *behaviour management and use of restraint*
- *dealing with allegations*
- *first aid and administering medicines*
- *providing intimate or personal care*
- *photography and videos*

8 Health and safety and risk assessments

8.1 Responsibility for health and safety

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

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

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/279429/DfE_Health_and_Safety_Advice_06_02_14.pdf

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

<p>Name: Nathalie Kusneratis Designation: School Business Manager Contact details: admin@acps.camden.sch.uk</p>
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8.2 Risk assessments

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

- on an annual basis for the school environment as a whole;
- for all school trips;
- for pupils travelling between locations during the school day;
- 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;

Model safeguarding and child protection policy for schools and colleges in Camden

- whenever there are any changes to the school environment or school practices;
- following any serious incident.

8.3 Working with aggressive and violent parents

Where schools are working with families who are known to CSSW and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher/principal and the designated safeguarding lead and the information shared with CSSW.

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

8.4 Site security and visitors

- The board of governors is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The head teacher/principal will decide whether or not contractors should be subject to DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher/principal 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

Model safeguarding and child protection policy for schools and colleges in Camden

- expected to wear a name-badge or carry some form of identification at all times when on the school/college premises;
 - suitably supervised by school/college staff at all times;
 - made aware of school/college health and safety procedures.
-
- The head teacher/principal and the board of governors 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/college policies.
 - Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
-
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

8.5 Use of the school premises by other organisations

The school/college will only allow use of the school premises by other organisations schools outside of school hours for the purposes of providing supplemental schooling if:

- the schools articles of trust or other incorporating document allows this;

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- the organisation provides an overview of what it intends to teach so that the board of governors is able to make a judgement on whether this is in line with the promotion of British values;
- the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks;
- the following reasonable and due diligence checks are taken out on the organisation by the school;
 - an internet search on the organisation
 - checks with Camden's Community Groups and Schools Consultant (020 7974 7319)
 - checks with Camden's Channel officer (020 7974 6050)
 - checks with Camden Community Safety and the local police (020 7974 2915)
- details of the agreement are recorded on the partnership agreement record available at: [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Board](#)

8.6 Monitoring and review

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

- all school/college policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and governing body;
- the school/college keeps a central record of all accidents and incidents including what action was taken and by whom;
- staff are aware of their responsibility to record accidents and incidents;
- the head teacher/principal has an overview all accidents/incidents;

Model safeguarding and child protection policy for schools and colleges in Camden

- serious accidents and incidents are reported to the board of governors;
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children;
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school/college safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

Part B: Additional safeguarding policies and procedures

B.1 Non-collection of children from school

This section applies to primary schools only

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

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

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

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

Model safeguarding and child protection policy for schools and colleges in Camden

- The schools will check with the child to see if there are any changes to arrangements for collection and try to make contact with the parent or other family members, and wait with the child until someone comes to collect them.
- Children will not be released into the care of another parent even where they offer to take the child home.
- The school will contact the Children and Families Contact Service to put CSSW on notice at 4.00 pm if there are difficulties in contacting parents or other family members.
- If no contact can be made with the parent by 4.30pm, the school will contact the Children and Families Contact Service who will arrange for a social worker to collect the child or make arrangements for the child to be transported to the CSSW office.
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so.
- Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead and reported to the Education Welfare Service. If there are also child protection concerns, a referral should be made to CSSW.

Additional policies

Individual schools should record any additional policies or procedures here

B2 Children who are missing from education or home educated

Schools need to be aware of those children who are persistently absent or missing from school as this may be an indicator of welfare concerns.

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 from education” policy and the CSCB missing children protocol for further details available at: [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Board](#)

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

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

B3 Peer on peer abuse

Where a pupil’s behaviour is likely to cause significant harm to other pupils, for example through bullying, cyberbullying, physical violence or initiation rites, the school/college will refer the **perpetrator and the victim** to the Child and Family Contact team under the *Peer on peer abuse* protocol available at: [link to be put in when policy finalised](#)

Where the harm is attributable to sexually abusive behaviour or sexual harassment, the school will follow the CSCB Harmful sexual behaviour; further details can be found in section B4 below.

B4 Harmful sexual behaviour, sexual violence and harassment

Policy

- The school/college recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. School/college behaviour management and anti-bullying policies will reflect the school/college'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.
- The school/college will follow the statutory guidance *Sexual violence and sexual harassment between pupils* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf
- The school/college will take all necessary steps to put in place a planned PHSE curriculum to convey the school/college's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct.
- The school/college will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school/college and appropriate referrals made to the police and CSSW.
- The school/college will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff.

Model safeguarding and child protection policy for schools and colleges in Camden

- The school/college will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

Procedures

- The school/college 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.
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, 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.
- Where the allegation involves material posted online, the school/college will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance *Searching, screening and confiscation advice for schools*.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the school/college will respond to the incident.
- Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the CSCB *Harmful sexual behaviour protocol*. The designated safeguarding lead may take advice from MASH social workers before

Model safeguarding and child protection policy for schools and colleges in Camden

making a decision. Possible outcomes include referral to Early Help Services, CSSW or the police, or managing the matter internally under school/college behaviour policies.

- Where a referral will be made to CSSW or the police under the protocol, the designated safeguarding lead 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/college will take any necessary action to continue to safeguard the victim and other pupils within the school/college environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and CSSW investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, the school/college 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.

Additional procedures

Individual schools should record any additional procedures here or refer to any separate policies.

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

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

When dealing with incidents, the school/college should ensure that the written report of the incident contains objective facts and sets out clearly the next steps to be taken, with the views of the victim clearly recorded.

Schools/colleges should be aware of their equality duty as victims of sexual violence and harassment are more likely to be female but should follow the same procedures and ensure the same level of response for incidents involving male pupils or incidents where victim and perpetrator are the same sex.

Cases may be managed internally by the school/college under without referral to other agencies where the incident involves low-level concerns and is a “one-off” occurrence where there is no further risk to the victim or other pupils

Schools/colleges should give careful thought to the day to day management of risk and support for the victim, taking into account the victim’s views when considering practical issues such as separating the victim and perpetrator. However schools/colleges must be able to justify any measures taken and that they do not interfere with the educational opportunities of either party.

Schools may wish to consider developing specific policies around responding to incidents of sexual violence and harassment towards staff members.

Schools/colleges need to ensure that staff and governors are able to take up training and support offered by Camden Learning around relationships and peer on peer abuse and how these messages should be delivered within the PSHE curriculum. Sexual violence and harassment will also be addressed in general, whole-school safeguarding training delivered by the CSCB, with designated safeguarding leads receiving more intense training in view of their role.

B5 Prevention of radicalisation

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

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

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

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

Where a school/college has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger pupil may be at risk due to their parent's radicalisation, the school/college will follow the guidance set out in the CSCB guidance "Safeguarding children and young people from radicalisation and extremism" available at: <http://www.cscb-new.co.uk/wp-content/uploads/2016/03/CSCB-guidance-on-radicalisation-and-extremism.pdf>

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

The school/college designated safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools officer (if they have one), the Police Prevent Engagement Officer (Mark Fowler, Mark.P.Fowler@met.pnn.police.uk or call 0208 733 6014) and Camden's Prevent co-ordinator (Karina Kaur, karina.kaur@camden.gov.uk or call 020 7974 6050) or the Prevent Education Officer (Jane Murphy, jane.murphy@camden.gov.uk or call 020 7974 1008).

Additional procedures

Individual schools should record any additional procedures here or refer to any separate policies

B6 Mandatory reporting of Female Genital Mutilation (FGM)

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

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

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

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

B7 Online safety

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

B8 Looked after and previously looked after children and care leavers

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

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

Additional procedures

Individual schools should record any additional procedures here or refer to any separate policies

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

Schools and colleges should also consider the potential vulnerability of relevant children; these are children who under the Leaving Care Act are children who are aged 16-17 and who were but are no longer looked after.

Many looked after young people in Camden who are aged 16 and 17 who remain looked after may be living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues and it is imperative that the designated safeguarding lead links with the designated LAC teacher where safeguarding concerns are raised.

B9 Children with special education needs or disabilities (SEND)

The school/college is aware that children with special education 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 and abuse due to communications difficulties and professionals may miss vital indicators.*

School policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. *The school/college will follow the CSCB guidance *Safeguarding children with disabilities**

Additional procedures

The school SENDCO is Alex Voelcker and she should be contacted in the case of safeguarding concerns of a pupil with SEND for additional information.

B10 Safeguarding vulnerable groups

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

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

Children at risk of forced marriage

Forced marriage - Detailed guidance - GOV.UK

Domestic abuse and/or sexual violence

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

*Schools can refer young people affected by domestic or sexual violence to the specialist worker based in the Camden Safety Net on **020 7974 1864** for advice and support. **Schools and colleges should also be aware that the definition of domestic abuse now includes victims aged 16 and 17 years old and that these victims should be referred to Camden Safety Net for a service in their own right.***

Privately fostered children

https://cscb-new.co.uk/?page_id=8261

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

Young carers

https://cscb-new.co.uk/?page_id=8264

*If schools have concerns about a pupil they believe to be a young carer, they can contact Family Action on **020 7272 6933** for advice and can refer the pupil on for services and support. Further details can be found on the website.*

www.family-action.org.uk

B11 Contextual safeguarding for young people

The school/college is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at school/college or from their own peer group.

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

*Schools/colleges 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** and trafficking.*

Children at risk of sexual exploitation

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

Young people at risk from gang activity or serious youth violence

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

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

Modern slavery and trafficked children

https://cscb-new.co.uk/?page_id=7271

The CSCB 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.*

Children who run away/go missing

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

B12 Other relevant safeguarding policies

Schools can access guidance on the following policies at www.nspcc.org.uk and [Department for Education - GOV.UK](http://www.gov.uk)

Alternative provision

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

Anti-discrimination & harassment

Attendance

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

Behaviour and discipline

<https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools-guidance-for-governing-bodies>

Bullying (including cyberbullying)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288444/preventing_and_tackling_bullying_march14.pdf

Children missing from school

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268987/cme_guidance.pdf

Complaints

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Drugs/substance misuse

Drugs: advice for schools - Publications - GOV.UK

Educational visits

Equality and diversity

Exclusion of pupils

<https://www.gov.uk/government/publications/school-exclusion>

Fabricated or induced illness

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf

Faith abuse

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

First aid and administration of medicines

Supporting children with medical conditions

Supporting pupils at school with medical conditions - Publications - GOV.UK

No smoking (EYFS)

Mental health

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf

Physical intervention

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268771/use_of_reasonable_force_-_advice_for_headteachers_staff_and_governing_bodies_-_final_july_2013_001.pdf

Private fostering

Promoting British values/Radicalisation and violent extremism

[Promoting fundamental British values through SMSC - Publications - GOV.UK](#)

SRE

Sexting

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/545997/Sexting_in_schools_and_colleges_UKCCIS_4_.pdf

Gender-based violence/teenage relationship abuse

Trafficking https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf

Appendix 1:

CHILD PROTECTION; DEFINITIONS AND INDICATORS

Definitions

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

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

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

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

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

Possible indicators of abuse and neglect

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

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

Appendix 2



St Aloysius
Catholic Primary

Archdiocese of Westminster/ Camden LA

St. Aloysius Catholic Primary School
Aldenham Street London NW1 1PS Tel: 02073879591

SAFEGUARDING MONITORING/REVIEW FORM		
CHILD'S NAME IN FULL:	CLASS:	DATE FORM COMPLETED:
DATE OF BIRTH:	ADULTS REGULARLY IN THE CLASS:	
ADULT(s) COMPLETING THE FORM:		

<i>Please circle as appropriate</i> INFORMALLY MONITOR	CHILD PROTECTION PLAN	CHILD IN NEED
FORMALLY MONITOR	LOOKED AFTER CHILD/ PUBLICCARE	NETWORK CHECK

Please use the sub headings below as a prompt to write a brief report

<u>Attendance and punctuality</u>
<u>Periods of absence if applicable (including dates)</u>

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Contact with parents/ family <i>Attend parents evening, co-operative, missed appointments, contact difficulties, supportive, expectations, critical, involvement with setting/child's education, other ...</i>
Health and physical appearance <i>Sight, hearing, dental, speech and language, weight, growth development, hygiene, medical appointments kept/not kept, other ...</i>
Behaviour and emotional presentation (including any sexualised behaviour) <i>self-esteem, confidence, self-image, self-expression, assertive, confrontational, attention seeking, popular, on task, bullying, victimized, withdrawn, isolated, aggressive, helpful, attendance, peer/adult relationships, other ...</i>
<u>Concerning incidents (with dates)</u>
<u>Peer relationships</u>

Academic performance and achievement <i>Academic progress-off track-on track-ahead, attainment –significantly below expected for age-working towards-expected for age-at age expected-above expected for age for each of reading, writing and maths, SEND, attitude to learning</i>
Interventions and out of hours clubs <i>(Learning interventions, outside agencies, Breakfast Club, after-school clubs)</i>
<u>Any other relevant information or concerns</u>

Outcomes of monitoring

- continue monitoring
- carry out CAF
- referral to CSSW
- referral to health services
- referral for education support services
- referral for behavioural support
- referral on behalf of parent/carer

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Appendix 3: School central record

Important notes

This record should indicate what checks have been taken out for the following:

- For schools, all staff, including supply staff and teacher trainees on salaried routes, who work in school and others who work in regular contact children in school, including volunteers
- For independent schools, including academies and free schools as above plus all members of the proprietorial body and involved in the management of the school
- For colleges, all staff providing education and/or whose positions involve a relevant activity

Agency staff

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

Volunteers

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

Regulated activity

Regulated activity (see p20 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly; where this is the case an enhanced DBS check is needed with a barred list check.

Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS check if a check is required, eg if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

Documents and certificates

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

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Record of checks taken out and/or certificates obtained

Name	Date of service	Address	DOB	Position held/ regulated activity?	Evidence of identity: (name of person carrying out check and date of check)	Barred list check (date and name of person carrying out check)	Enhanced DBS check (date and name of person carrying out check)	Prohibition from teaching check (date and name of person carrying out check)	Prohibition from management of schools under section 128 check (independent and free schools and academies only)	Checks on persons from overseas (date and name of person carrying out check)	Checks on professional qualifications/ Certificates obtained (date and name of person carrying out check)	Checks on right to work in the UK/documents obtained (date and name of person carrying out check)	For supply staff, evidence from the employment agency that relevant checks have been carried out (date of confirmation and name of school staff checking)

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Appendix 4: Schools safeguarding checklist

To be used by the head teacher and governors to carry out an assessment of the school's safeguarding framework

Name of school:

Address:

Head teacher:

Contact details:

Date of safeguarding assessment:

Requirement	Yes	No	Comments/action
Leadership and the safeguarding and child protection framework			
The school has comprehensive safeguarding policies covering early help and child protection and a staff conduct policy covering use of technology, relationships with pupils, communications and use of social media			
The school has agreed procedures for dealing with incidents of sexual violence and sexual harassment that are linked to the school's behaviour and bullying policies			
There are agreed local procedures in place for making referrals to CSSW where there are concerns about the safety and welfare of a child			
There is a designated governor with responsibility for safeguarding and child protection			
A senior member of the leadership team has been appointed as the designated safeguarding lead and a nominated deputy to carry out the role in their absence and they have the time and resources allocated to carry out their responsibilities			
The safeguarding lead and their deputy have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every 2 years.			
Arrangements are in place to ensure staff can liaise with the safeguarding lead or their deputy at all times during school hours			
The school promotes a multi-agency approach to safeguarding and child protection in line with <i>Working together</i> and staff are able to attend child protection conferences and other multi-agency meetings as appropriate			
The curriculum offers opportunities for pupils to learn how to keep themselves safe, including online, and offers pupils guidance on healthy relationships			
The school promotes positive behaviour and this is reflected in behaviour management strategies used; reasonable force and restraint is used only in line with legislation; use of any behaviour			

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management strategy is tailored to the needs of the pupil and carefully monitored for effectiveness			
The school has effective policies for dealing with bullying and discrimination, including cyberbullying, sexting and inappropriate language			
There is a policy around dealing with allegations against staff and all staff are aware of the policy and know what action to take if they have concerns about another member of staff			
The school has a policy of openness and challenge and staff and pupils feel safe to raise concerns; there is a whistleblowing policy in place and all staff and pupils know who to contact if they are concerned that safeguarding issues are not being adequately dealt with by the school			
The school has an internet safety policy setting out how pupils will be kept safe online and the standards for use of technologies expected from pupils and staff including mobile devices; all pupils and staff have signed an acceptable use agreement			
The school have taken steps to implement the Prevent duty and staff are aware of how to make appropriate referrals to Channel Panel			
The school has a policy on dealing with children who harm other children and all staff are aware of what action to take under this policy			
The school seeks the views of pupils and parents with regard to safeguarding issues and all safeguarding and child protection policies are available on the school website			
Staff knowledge and e safeguarding practice			
All staff are inducted in safeguarding arrangements in the school and have received and read all relevant policies			
All staff have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every 3 years.			
All staff receive regular updates to safeguarding and child protection legislation via the designated safeguarding lead as required			
All staff are able to identify those children who may benefit from early help and are able to provide support within the school or make appropriate referrals to Camden's Early help service			
All staff are able to recognise the indicators of abuse and harm, can identify children who may be at risk of harm			
All staff know what action to take to refer children appropriately to CSSW where there are concerns and make timely referrals and follow up referrals where it is thought the child's situation is not improving			
All staff are aware of their legal duty under the mandatory reporting rules for FGM and can make appropriate notifications to the police and CSSW in known cases of FGM			
All staff are aware of what actions to take when a child goes missing from education or does not attend			

Model safeguarding and child protection policy for schools and colleges in Camden

and that missing episodes are monitored; all staff are aware of the link between going missing and safeguarding issues such as sexual exploitation, criminal behaviour, substance misuse and trafficking; there are procedures in place to notify Camden where a child is removed from the school roll in line with the local <i>Children missing from school policy</i>			
All staff are able to share information lawfully and appropriately and work jointly with partner agencies; parents are informed of concerns and actions taken unless this puts the pupil at further risk			
Records of concerns and referrals are up to date and timely and kept securely			
All staff receive regular supervision that enables them to raise safeguarding issues			
Risk assessments are routinely carried out to ensure the health and safety of pupils on site, on school trips and during work experience			
Pupils feel safe and are aware of how to raise concerns and complaints with a trusted adult			
Safer recruitment			
The school has a safer recruitment procedure that is in line with statutory requirements			
The school has a single central record providing details of when and by whom the following checks on candidates were taken out: <ul style="list-style-type: none"> • Identity checks • DBS/barred list checks • Prohibition from teaching/section 128 checks • Appropriate checks with overseas organisations where the candidate is from abroad • Checks to establish right to work in the UK • Professional qualifications check 			
The school has a clear system in place in line with statutory requirements for volunteers or contractors coming into the school, .Enhanced DBS checks are taken out on all staff members, volunteers and governors; barred list checks are also taken out on staff, volunteers and governors who are involved in regulated activity			
The head teacher or other member of the senior leadership team decides on whether or not volunteers, visitors or contractors require a DBS check and this decision is informed by a risk assessment; arrangements are put in place to supervise and oversee volunteers, visitors and contractors where a DBS check is not carried out and children are not left unsupervised with any individual who has not undergone a DBS check			
The school seeks written confirmation from agencies that these checks have been taken out on all agency and supply staff prior to appointment; all agency and supply staff are required to present proof of identity prior to beginning work			
A member of the governing board or senior leadership team involved in interviewing has completed an accredited safer recruitment training course			

Model safeguarding and child protection policy for schools and colleges in Camden

Dealing with allegations against staff			
There is a named staff member with responsibility for liaising with the police and LADO			
Appropriate referrals are made to the DBS where staff cease to work at the school following investigation into allegations			