



Safeguarding and Child Protection Policy and Procedures for Gloucester House

The Tavistock Children's Day Unit

Approved on behalf of the Steering Group by:	Sally Hodges - Chief Operating Officer (COO) & Gloucester House Steering Group Chair & Safeguarding Lead.
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PART A: CORE OPERATIONAL POLICIES AND PROCEDURES

1. Purpose of policy

This policy sets out how Gloucester House 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. Gloucester House will achieve this by providing a safe learning environment and ensuring 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.

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

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

2. Linked policies

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

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

All policies are available at: [Schools and Nurseries Safeguarding Policies - Camden Safeguarding Children Partnership — CSCP](#)

This policy is in addition to the Tavistock and Portman Mental Health Foundation Trust (hereafter referred to as the Trust) Safeguarding Children Procedure (April 2020). It aims to provide specific guidance regarding the provision of education within a multi-disciplinary mental health setting.

Gloucester House makes every effort to safeguard and to promote the overall welfare of its pupils. As a specialist multi-disciplinary service, Gloucester House recognises a shared responsibility to ensure the safety and wellbeing of every child placed with us. While we would normally first want to discuss, and where possible resolve with the child's parents/carers any concerns that might arise, we work within a framework in which we inform the Trust's Safeguarding Leads and the Safeguarding Section of the Children's Services where the child is resident if we have child protection concerns.

For the purpose of this document the term 'Gloucester House Staff' should be understood to include all educational, clinical, administrative and support staff, trainees, students and volunteers working at Gloucester House on a full-time, part-time or temporary basis.

3 Roles and responsibilities

3.1 Camden Supporting People Directorate

Whilst we currently do not have any Camden children, Gloucester House access the LADO, DSL and staff training from Camden.

The Directorate includes Children's Safeguarding and Social Work (CSSW), Early Intervention and Prevention and Education divisions and these services will support Gloucester House 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 Gloucester House 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.

3.2 Steering Group

The Steering Group members will ensure that Gloucester House meets its statutory duties with regard to safeguarding and protecting pupils and that processes are in

place to enable staff to understand the nature of safeguarding children in education and their role and responsibilities in doing so.

This includes the school/college's legal duties under the Human Rights Act 1998, the Equality Act 2010 and the Public Sector Equality Duty (see Appendix 3).

In particular, the Steering Group will ensure the following:

Gloucester House has the following policies in place and that these are regularly monitored, reviewed and updated where necessary;

- Safeguarding and child protection policies and procedures covering early help, online safety, extra-familial harm and peer on peer abuse and child protection that are consistent with Camden Safeguarding Children Board procedures and Camden's internal policies.
- A staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media.
- a behaviour policy that includes measures for bullying and harassment, including prejudice based and discriminatory bullying
- A procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- Gloucester House 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 Steering Group member with responsibility for liaising with other boroughs on safeguarding and child protection matters as appropriate 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 DSL 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 directed to 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 Gloucester House and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents/carers and pupils are aware of Gloucester House safeguarding and child protection policies and procedures.
- Steering group members to take steps to ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- Gloucester House (supported by the Trust) 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 Steering Group 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 DSL to ensure they remain up to date with new legislation.
- Gloucester House 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.

3.3 Head teacher/deputy head teachers / Senior Leadership Team

The Headteacher and Senior Leadership Team will ensure that Gloucester House meets its statutory safeguarding duty by ensuring the following:

All staff are aware of their role and responsibilities for safeguarding under Part 1 of the guidance *Keeping children safe in education (2022)*.

- Staff are inducted thoroughly in line with section 5.1 of the *Safer recruitment and staff conduct policy for schools and colleges* and have read all the schools safeguarding and child protection 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 safeguarding and child protection concerns and can make appropriate referrals to CSSW.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff in line with *Safer recruitment and staff conduct policy for schools and colleges*.
- Gloucester House offers a safe environment for staff and pupils to learn.
- Safeguarding issues are brought to the attention of the Steering Group.

3.4 Roles of the Designated Safeguarding Lead (DSL)

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

Staff will report to the child's Case Coordinator if the DSL or deputy DSL/clinical lead is not available.

The designated safeguarding lead (and their deputy) will:

- Liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Police and the Disclosure and Barring Service (DBS).
- Keep the head teacher, senior leadership team and the Steering Group informed of on-going safeguarding and child protection issues and enquiries.
- Provide advice and guidance for staff on safeguarding and child protection issues and support them through the referral process
- Ensure both Gloucester House and the Tavistock & Portman NHS Trust's safeguarding and child protection policies are up to date and consistent with Camden's Safeguarding Children Partnership 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 through robust induction processes.
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.
- provide regular updates received from Camden to all staff members and Steering Group members 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 be more vulnerable to poor educational outcomes due to safeguarding and other issues such as children in need, children with child protection plans, children with mental health issues, young carers and children who have special educational needs
- Liaise with the SENDCO when considering any safeguarding action for a child with special needs.
- liaise with the school's clinical lead or case coordinator as appropriate where the safeguarding concerns are linked to mental health issues
- Raise awareness with staff on how children's vulnerabilities and exposure to neglect, abuse and trauma can negatively influence their educational attainment and behaviour and how staff can work to meet these challenges and improve outcomes;
- Liaise with the child's Local Authority Virtual School Head in order to meet the new educational needs of children known to CSSW
- 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 Gloucester House, including the management of records ensuring confidentiality, standards of recording concerns and referral processes.
- Provide a link between Gloucester House and other agencies, particularly CSSW and the Camden Safeguarding Children Partnership and key agencies in other boroughs as appropriate.
- Ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years, including online safety training,

identifying the early signs of child-on-child abuse and sexual violence and sexual harassment

- Ensure parents/carers are fully aware of the school policies and procedures and that they are kept informed and involved. encourage a culture where children are listened to, their views taken into account and where they are encouraged to participate in keeping themselves safe;
- Ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer.

3.5 Working with Parents and Carers:

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

Gloucester House will:

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

From the DfE on dealing with issues around parental responsibility:

<https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility>

3.6 Gloucester House Outreach Service:

The Gloucester House Outreach Service is compliant with Gloucester House and the Trust Safeguarding Children policy and procedures. All outreach staff receive the same level of safeguarding induction, ongoing training and supervision as other members of staff at Gloucester House. Outreach staff are expected to have a good knowledge of Gloucester House Safeguarding and Child Protection policies and procedures.

Where a child receiving outreach support is in school, outreach staff will follow the commissioning school's safeguarding policy and procedures. The commissioning school will provide Gloucester House outreach staff with their safeguarding policy, their behaviour policy and any additional restraint or touch policy, in order to ensure that outreach staff know and follow the procedures and protocols of the commissioning school. The commissioning school will inform the outreach worker of the name of their designated safeguarding lead (DSL).

While the commissioning school is responsible for making safeguarding referrals, Gloucester House DSL/Deputy DSL reserves the right to make a safeguarding referral if considered necessary. Gloucester House Outreach staff will on the same day discuss and email concerns to the Gloucester House DSL/Deputy DSL as well as the outreach service Clinical Lead. A record of the discussion will be recorded on care notes.

Where child is not on role in any school, outreach staff will discuss concerns on the same day with senior staff at Gloucester House (using the 'on call' system).

Whenever there is a serious safeguarding concern, the DSL/Deputy DSL will consult with the Trust Designated Professional.

In accordance with Gloucester House safeguarding and child protection policy and procedures, section 4.4, parents/carers will normally be informed of the safeguarding concerns and their consent sought to inform Children's Services.

It is essential for those working in the outreach service to carry out detailed risk assessments before starting a piece of work and to take appropriate action to reduce any risks that are identified.

Outreach workers should also be mindful of the Trust 'Procedures for the Personal Safety of Lone workers'.

3.7 Multi-agency working

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

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

Steering Group members, school managers and the senior leadership team will ensure these safeguarding arrangements are followed and that Gloucester

House is able to raise any safeguarding issues and emerging trends as appropriate with the Trust's safeguarding lead or local authority.

Full details of the Camden borough arrangements can be found at:
https://cscp.org.uk/wpcontent/uploads/2021/10/CSCP_Arrangements_2021-22.pdf

3.8 Contacting the police

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

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

3.9 Operations Encompass

Gloucester House will take relevant action on receipt of all police notifications of children who have been involved in domestic abuse incidents via Operation Encompass.

The designated safeguarding lead will inform relevant staff of any notification and agree what support (if any) the pupil should receive from Gloucester House.

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

Schools/colleges should share details of the notification with as few staff members as possible in order to keep the information confidential, and schools/colleges will need to decide on the most appropriate staff member to be informed;

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

4 Safeguarding children

Gloucester House 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.

Gloucester House will refer to local authority'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.

[Thresholds-for-childrens-services.pdf \(cscp.org.uk\)](https://www.cscp.org.uk/thresholds-for-childrens-services.pdf)

[Safeguarding children - Camden Council](#)

All referrals for a children's social care service will be made by according to the local authority procedures.

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

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

4.1 Early help cases

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

- Children with disabilities and additional needs, including those with special educational needs
- children with mental health needs
- Young carers
- Children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime or county lines;
- Children who frequently go missing from home, school or care;

- Children who are misusing drugs or alcohol;
 - Children at risk of exploitation through modern slavery and trafficking;
 - Children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
 - Children who have returned home from care;
 - Children who show early signs of abuse or neglect;
 - Children at risk of radicalisation;
 - children at risk from honour based abuse i.e.: FGM, forced marriage
 - children who have a parent in prison or who are affected by parental offending;
 - Privately fostered children.
 - children who are persistently absent from school including for part of the school day.
- Where the child's extra needs require services, consideration will be given to what early help support can be offered a child by Gloucester House.
 - If the child requires an early help service from another agency, Gloucester House will make a referral to the Early Help service for appropriate help and support. Staff will consult with parents/carers 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, Gloucester House will work as part of the Team around the Family and take up the role of lead professional where this is appropriate.
 - Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If Gloucester House believes that this is not the case, consideration should be given making a referral for a statutory social work service.

4.2 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 and case coordinator or their deputy who most likely have the most complete safeguarding overview. Following consultation the designated safeguarding lead should decide on whether to make a referral to the local authority child protection services/MASH team.

4.2.1 Safeguarding referrals

The following actions may be taken by the borough following referral:

- 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 5 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).

5. Child protection procedures

5.1 Role of school

Gloucester House 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*)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- 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 Partnership child protection procedures
[London Safeguarding Children Board: Child Protection Procedures](#)
- Keeping children safe in education (*DFE 2022*)
[Keeping children safe in education 2022 \(publishing.service.gov.uk\)](#)

In line with these policies and procedures, Gloucester House will:

- Identify those pupils where there are child protection concerns and make a referral to the local authority child protection departments/MASH teams.
- 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.

5.2 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 details recorded on the CP1 – Cause for concern email as per internal reporting procedures (Appendix 4).

5.3 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 mash.
- 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 (Cause for concern email – see Appendix 4) to notify the DSL/deputy DSL.

5.4 Referral – *(refer also to the Trust-wide Safeguarding Procedure):*

- Where possible, a decision on whether or not to refer a pupil to MASH should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns and the child's case coordinator. 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.
- Referrals should be in writing using the referral system as per local authority requirements by the case coordinator or DSL.
- 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 in Camden or the relevant local authority to obtain advice on how to proceed.
- The Trust Safeguarding lead can also be contacted for advice and guidance.
- The trust safeguarding alert form also needs to be completed a record added to Carenotes.
- Parental consent should be sought prior to the referral being made but a referral can be made if parents/carers refuse consent where there are safeguarding concerns about the child and referral is a proportionate response to these concerns. Consent should not be sought if this would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay.
- If the child already has an allocated social worker, the referral should be made directly to them.
- If Gloucester House does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with Early Help services in the local authority and with the Tavistock safeguarding lead.

5.5 Attendance at case conferences and core groups

- The designated safeguarding lead or child's case coordinator will liaise with social care to ensure that all relevant information held by Gloucester House is provided to social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that Gloucester House is represented at child protection case conferences and core group meetings:
- Where possible, a member of staff who knows the child well will be nominated to attend. Usually this is the child's case coordinator.
- Failing that, the designated safeguarding lead, their deputy or the class teacher will attend.

- If no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting. Usually the child's case coordinator will complete this.

5.6 Monitoring

- Where a pupil is the subject of a child protection plan and the school has been asked to monitor their attendance and welfare as part of this plan.
- Monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead.
- All information will be recorded on Carenotes and the Gloucester House Safeguarding System. Additionally, we will use the Safeguarding Children monitoring/incident form (Appendix 2) during safeguarding supervision as necessary.
- 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 or the child's case coordinator.
- The designated safeguarding lead or child's case coordinator will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

5.7 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 Gloucester House.
- 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 email using the Gloucester House reporting system.

Due to the complexity of the work, Gloucester House maintains detailed records of 'cause for concern' in addition to safeguarding and child protection.

Records should show:

- What the concerns were.
- What action was taken to refer on concerns or manage risk within Gloucester House.
- Whether any follow-up action was taken.
- How and why decisions were made.

- Child protection records(except those which are on care notes) will only be kept until the pupil leaves Gloucester House and should be disposed of as confidential waste if paper and deleted if stored electronically.

Transferring Child Protection Records to a child’s next educational placement:

When a child transfers to another placement, the case co-ordinator will incorporate into the child’s written Discharge Summary a brief account of any child protection concerns relating to that child while s/he has been attending Gloucester House. Information relating to child protection is always sent separately to educational documents, marked ‘strictly confidential’, and addressed to the DSL for that placement.

The Cause for Concern form must be completed:

- Whenever concerns arise or there is a serious safeguarding incident or
- Where a child is being monitored, prior to a case conference or core group meeting.
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken.

The monitoring/incident form must be completed;

- whenever concerns arise or there is a serious incident or
- where a child is being monitored, prior to a case conference or core group meeting.
- Child protection files must be accessed and information shared by members of staff on a “need to know” basis only.
- Where a child who is subject to a child protection plan and 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 within 5 days.
- The designated safeguarding lead may also consider contacting the new school to share relevant information in order to ensure the child receives the support they need as soon as they transfer.
- Child protection records will only be kept until the pupil leaves the school/college and should be disposed of as confidential waste.

5.8 Confidentiality and Information-Sharing: (Refer also the Trust Safeguarding Children Procedure)

All information obtained by Gloucester House staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent unless there are safeguarding concerns that need to be shared with social care and the parents/carers refuse consent or seeking consent would place the child at further risk.

- If the child is under 12, consent to share information about them must be obtained from their parents or carers.
- Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues.
- Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act (2005); otherwise consent should be sought from parents/carers.

Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with social care and the relevant children's services 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 social care.

Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents/carers 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?

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 MASH team social worker, the Trust Safeguarding lead or a designated professional could also be consulted 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/carers should also be made aware of the schools 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 Camden, the Child and Family Contact team social worker and the Safeguarding lead of the Tavistock or a Trust designated professional.

6 Health and safety and risk assessments

6.1 Responsibility for health and safety

The Steering Group body and head teacher and the Trust Health and Safety department 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. (See *Gloucester House Health and Safety Procedures March 2020 – 2023*. See also *Trust policy and procedures*)

Any health and safety policy adapted by Gloucester House 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 Gloucester House will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training.

Lisa Tucker (Tavi)

Contact details: LTucker@tavi-port.nhs.uk

Ben Neasom (Gloucester House)

Contact details: BNeasom@tavi-port.nhs.uk

6.2 Risk assessments:

Risk assessments are a method of:

- Identifying hazards
- Evaluating the risks these hazards may present to children and staff
- Deciding on appropriate action to eliminate or reduce these risks.

Gloucester House follows both the Trust Policy and Procedures for Clinical and Health & Safety Risk Assessments and Gloucester House Risk Assessment procedures.

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

- On an annual basis for the 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;
- Whenever there are any changes to the school environment or school practices;
- Following any serious incident.

6.3 Working with aggressive and violent parents

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

If there are high levels of risk involved in contact with parents/carers, social care 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.

6.4 Site Security and visitors

- The Steering Group is responsible for the security of Gloucester House premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- In general, occasional visitors to the school/college such as parents will not be subject to DBS checks but their movement around the premises will be supervised.
- The head teacher and Steering Group 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.
- The head teacher 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
 - expected to wear a name-badge or carry some form of identification at all times when on the school premises;
 - suitably supervised by school staff at all times;
 - made aware of school health and safety procedures. □ The 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 policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the head teacher/principal will request written confirmation that relevant checks have been carried out for that individual.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

6.5 Alternative education provision

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

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

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

6.6 Use of the school premises by other organisations

Gloucester House 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;
- the organisation provides an overview of what it intends to use the premises for so that the steering group is able to make a judgement on whether this is in line with the promotion of British values;
- the organisation can provide copies of child protection policies and procedures and the school/college accept these as adequate;
- 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 Gloucester House;
 - an internet search on the organisation
 - checks with Camden's Community Groups and Schools Consultant (020 7974 7319)
 - checks with Prevent Education officer (020 7974 1008)
 - checks with Camden Community Safety and the local police (020 7974 2915)
- Details of the agreement are recorded on the partnership agreement record with clear provision for the circumstances under which the agreement can be terminated by the school/college for breach.

6.7 Monitoring and review

To enable Gloucester House to monitor the safety of the premises and the school environment, as well as the implementation of policies, the head teacher and the Steering Group will ensure that;

- All school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and Steering group and health and safety lead at the Tavistock and Portman.
- The school, through the Tavistock and Portman Health and Safety department, 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 through the Deputy Headteacher / the Tavistock incident panel and the GH behaviour system has an overview all accidents/incidents.
- Serious accidents and incidents are reported to Steering Group.
- 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 Incident Panel and Steering Group to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

PART B ADDITIONAL SAFEGUARDING POLICIES

Additional safeguarding policies and procedures:

- Tavistock and Portman health and safety
- Off site visits
- Health and safety for first aid
- COSHH
- Medication procedures
- Risk assessment procedures

B1 Non-collection of children from school (N.B most of the children are transported via the local authority)

Gloucester House will check the identity of escorts and other adults who are not their parent or known carer at the end of the school day. Parents /Carers will be asked to provide the details of any person who is not the escort who will 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. Gloucester house 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/carers will also be asked to inform schools where children are subject to court orders that limit contact with a named individual or when information about the child should not be divulged because it may pose a risk to the child.
- In the event that anyone who is not authorised to do so attempts to collect the child, Gloucester House will not allow the child to leave but contact the parent immediately.
- In the unlikely event a child is uncollected at the end of the school day and it is not possible to contact parents/carers, Gloucester House will contact social care.
- Gloucester House will regularly ask parents/carers 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 or if a child is unable to travel in the local authority transport.
- Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead and reported to the Local Authority. If there are also child protection concerns, a referral should be

made to social care.-Transport issues will be managed by Gloucester House in liaison with & SEN and parents/carers.

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/carers 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/carer notifies Gloucester House that they are removing the child so they can be educated at home, the following notifications should be made:

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

B3 Child on child abuse

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

- bullying and cyberbullying
- physical violence
- sexual violence and sexual harassment
- upskirting
- sexting
- initiation rites (hazing).

All incidents of peer on peer abuse will be dealt with under the *Child on child and sexual violence and harassment guidance for schools and colleges* available at: [Schools and Nurseries Safeguarding Policies - Camden Safeguarding Children Partnership — CSCP](#)

B4 Harmful sexual behaviour, sexual violence and harassment

Policy

- Gloucester House recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. School behaviour management and anti-bullying policies will reflect Gloucester House'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.
- Gloucester House 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/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf
- All incidents involving sexual violence or sexual harassment between pupils will be dealt with under the Peer on peer and sexual violence and harassment guidance for schools and colleges guidance and the Harmful sexual behaviour protocol.
<https://cscp.org.uk/resources/sexual-harmful-behaviours/>
- Gloucester House will take all necessary steps to put in place a planned PHSE curriculum to convey the schools policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct.
- Gloucester House 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 Gloucester House and appropriate referrals made to the police and social care.
- Gloucester House will ensure that staff and the Steering Group 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.
- Gloucester House 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

- Gloucester House 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 environment.
- Where the allegation involves material posted online, Gloucester House 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 Gloucester House will respond to the incident.
- Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the CSCP *Harmful sexual behaviour protocol*. The designated safeguarding lead may take advice from MASH social workers before making a decision. Possible outcomes include referral to Early Help Services, social care or the police, or managing the matter internally under school behaviour policies.
- Where a referral will be made to social care 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/carers.
- Gloucester House will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and social care 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, Gloucester House 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.
<https://cscp.org.uk/resources/sexual-harmfulbehaviours/>

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, Gloucester House ensures 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 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 Gloucester House 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 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 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 need to ensure that staff and Steering Group members 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 CSCP, with designated safeguarding leads receiving more intense training in view of their role.

B5 Prevention of radicalisation

Gloucester House's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

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

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

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

- Gloucester House will follow the guidance set out in the CSCP guidance "Safeguarding children and young people from radicalisation and extremism" where:
- a school has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or
- That a younger pupil may be at risk due to their parent's radicalisation. The guidance is available at: <https://cscp.org.uk/wpcontent/uploads/2019/06/CSCB-guidance-on-radicalisation-andextremism.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. Gloucester House should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.

Gloucester House's 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 Camden's Prevent coordinator (Albert Simango, albert.simango@camden.gov.uk or call 020 7974 2010) or the Prevent Education Officer (Jane Murphy, jane.murphy@camden.gov.uk or call 020 7974 1008).

B6 Mandatory reporting of Female Genital Mutilation (FGM)

Gloucester House 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, Gloucester House will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the CSCP guidance available at:

<https://cscp.org.uk/wp-content/uploads/2019/06/FGM-mandatoryreporting-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 are taught how to remain safe online, Gloucester House will incorporate the recommendations of Camden's model schools online policy into the Gloucester House Online Safety policy. <https://cscp.org.uk/professionals/schools-and-nurseries-safeguarding-policies/>

B8 Looked after and previously looked after children and care leavers

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

Gloucester House 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.

Schools should be aware of the 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 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.

B9 Children with Special Education Needs or Disabilities (SEND)

All pupils at Gloucester House have SEND needs and EHCPs. Gloucester House 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. Gloucester House will follow the CSCP guidance *Safeguarding children with disabilities* available at:

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

SEN policy/SEN information on website.

B10 Safeguarding vulnerable groups

Gloucester House 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, social care or other agencies in order to overcome problems or keep them safe.

Gloucester House will adhere to the following policies in order to respond to the needs of these vulnerable groups.

Children who have a social worker

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

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

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

Children at risk of forced marriage

Forced marriage - Detailed guidance - GOV.UK Domestic

abuse and/or sexual violence

<https://cscp.org.uk/wp-content/uploads/2019/06/CSCB-domestic-abuse-guidance.pdf>

Schools can refer young people affected by domestic or sexual violence to the specialist worker based in the local authorities Camden Safety Net on 020 7974 1864 can be contacted 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://cscp.org.uk/resources/private-fostering-resources/>

Schools have a legal duty to notify local authorities 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 for any Camden residents.

Young carers

<https://cscp.org.uk/resources/young-carers/>

If schools have concerns about a pupil they believe to be a young carer, they can contact Family Action on 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 Extra-familial harm and exploitation

Gloucester House is aware of the risk to children and young people from extra-familial harm and staff will be vigilant to the indicators of extrafamilial harm in relation to pupils at all times.

Whenever staff are made aware of any safeguarding incident or concerning behaviour that has taken place out of the home and that has put a pupil at

risk, staff will discuss the matter with the designated safeguarding lead and consider the level and nature of the risk before making decisions on referrals.

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

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

- *Child sexual exploitation*
- *Child criminal exploitation including county lines*
- *Modern slavery and trafficking* □ *Gang activity and youth violence* □ *Radicalisation.*

Exploitation is a form of abuse involving an imbalance of power within a relationship that allows one party to use this power to manipulate another to carry out an act. The victim may believe that they are acting on their own accord but in fact their consent has been obtained through deception, duress or force and threats of violence.

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

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

Children at risk of sexual exploitation

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

County lines and criminal exploitation

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

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

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

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

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

Modern slavery and trafficked children <https://cscp.org.uk/resources/child-trafficking-and-modern-slavery/>

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

Young people at risk from gang activity or serious violence [Safeguarding children and young people who may be affected by gang activity - Publications - Inside Government - GOV.UK](#)

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

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 of the home borough. School can ring Camden for advice on 020 7974 6174.

Children who run away/go missing

<https://cscp.org.uk/resources/missing-children-from-home-and-care/>

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

B12 Children and young people experiencing mental health issues

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

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

<https://cscp.org.uk/wp-content/uploads/2021/05/Interim-multi-agency-protocol-on-children-and-young-people%E2%80%99s-mental-health2021.pdf>

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

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

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

Gloucester House will ensure that staff are teaching about mental wellbeing (as part of the statutory Health Education) to help reduce the stigma attached to mental and emotional problems. Gloucester House will also ensure early identification of pupils who have mental health needs and put in place appropriate support and interventions, including specialist services, where needed.

Gloucester House will take account of the government guidance *Mental health and behaviour in schools*.

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

Additional procedures

As an integrated mental health and education service we provide a full programme of CPD induction and CPD for staff.

Our curriculum is personalised for the whole child and each child has an Integrated Care Plan (ICP)

The presence of mental health and emotional issues in children and young people may indicate that they have experienced some form of trauma in their lives such as neglect, abuse, social exclusion or bereavement, requiring a joint response from mental health services and social care. As well as our integrated work in Gloucester House, we also link with local CAMHS services as necessary. The CSCP is developing a multi-agency protocol on children and young people's mental health that will provide schools and colleges with guidance on recognising and responding to pupil's mental health and emotional needs and when to make appropriate referrals to the relevant mental health and social care service.

B13 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

Drugs/substance misuse

[Drugs: advice for schools - Publications - GOV.UK](http://www.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](http://www.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

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

Sexting

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/545997/Sexting in schools and colleges UKCCIS 4 .pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/545997/Sexting_in_schools_and_colleges_UKCCIS_4.pdf)

Gender-based violence/teenage relationship abuse Trafficking

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

Health and safety

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

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

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

APPENDIX 2: SAFEGUARDING CHILDREN MONITORING/INCIDENT FORM

Name of school:

Name of child:

DOB:

Status: monitoring due to concerns subject to child protection plan

Concerns/risks

Attendance and punctuality Periods of exclusion (including dates) Contact with parents/family Health and physical appearance Behaviour and emotional presentation (including any sexualised behaviour) Concerning incidents Peer relationships Academic performance and achievement
--

Views of child and parents

--

Outcomes of monitoring

continue monitoring carry out CAF referral to social care

referral to health services referral for education support services

referral for behavioural support referral on behalf of parent/carer

Action taken

--

Name of staff member:

Date:

APPENDIX 3: LEGAL DUTIES

Human Rights Act 1998

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

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

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

Equality Act 2010

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

Schools must be able to demonstrate that they have taken proportionate positive action and/or made reasonable adjustments in order to deal with the disadvantages faced by these groups. For more guidance see: [Equality Act 2010: advice for schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Equality Duty

Under the Equality Act, public organisations such as schools have a duty to eliminate unlawful discrimination, harassment and victimisation and ensure equality of opportunity for all pupils. When making decisions, schools must be aware of this duty and ensure that decisions do not unlawfully discriminate against groups of pupils who are protected under the Act. For example, schools should be aware that some groups of pupils, for examples girls or LGBTQ pupils may be more vulnerable to sexual violence or harassment.

For more information please see: [Technical Guidance on the Public Sector Equality Duty: England | Equality and Human Rights Commission \(equalityhumanrights.com\)](http://equalityhumanrights.com)

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			
The school and governing body is aware of duties under the Human Rights Act 1998 and the Equality Act 2010			
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 multiagency 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 in line with the new statutory duty to provide relationships and sex education.			
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 management strategy is tailored to the needs of the pupil and carefully monitored for effectiveness; efforts are made to reduce the use of physical intervention and restraint for vulnerable children.			
The school has effective policies for dealing with bullying and discrimination, including cyberbullying, sexting, upskirting 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 have taken steps to implement the Prevent duty.			
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 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 extra-familial harm and the indicators that a pupil may be at risk from harm within the community, particularly through criminal and sexual exploitation, and know what action to take to refer the pupil on for safeguarding			
All staff are aware of what actions to take when a child goes missing from education or does not attend 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</i> policy			
All staff are aware of how harm, abuse, neglect and trauma can impact on pupil's mental wellbeing and can recognise those pupils who need help with their mental health; all staff know what actions to take to signpost or refer pupils who need a mental health service.			
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			

<p>The school has a single central record providing details of when and by whom the following checks on candidates were taken out:</p> <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 			
<p>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</p>			
<p>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</p>			
<p>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</p>			
<p>A member of the governing board or senior leadership team involved in interviewing has completed an accredited safer recruitment training course</p>			
<p>Dealing with allegations against staff</p>			
<p>There is a named staff member with responsibility for liaising with the police and LADO for all staff subject to allegations, including supply staff</p>			
<p>Appropriate referrals are made to the DBS where staff cease to work at the school following investigation into allegations</p>			

APPENDIX 5: CP1 – CAUSE FOR CONCERN/CHILD PROTECTION INCIDENT REPORTING PROCEDURE

What is a Cause for concern?

- Following any incident which raises concern about possible child abuse a **Cause For Concern email needs to be submitted.**
- It should be completed by the member of staff most directly involved with the incident/concern. Information should be recorded accurately and confidentially.
- The Cause for Concern email should be sent **the the same day** for a decision to be made about what should happen next.

How to report a concern & what detail to include:

•HOW:

- 1) Send an email titled '**SAFEGUARDING - CAUSE FOR CONCERN - [INITIALS OF CHILD/REN]**' to: GHsafeguarding@Tavi-Port.nhs.uk - **You must copy the DSL / DEPUTY DSL and the CC of the child/ren the concern is related to**
- 2) CC's must reply to '*reply all*' after the cause for concern email is received to acknowledge receipt and state any actions taken thus far.

•WHAT DETAILS TO INCLUDE:

- Child/ren the concern is about.
- Date & Time of incident.
- Place where the incident or observation of injury/disclosure occurred.
- Adults/Children present.
- **Detail in the email EXACTLY what you saw or heard, including actual site of any injury (e.g. upper right arm/ the size and colour of bruising) OR an exact record (as far as is possible) of anything said to you by the child. Also detail any relevant comments by yourself (avoiding asking any more questions than are necessary to clarify any uncertainties).**
- If required, attach any additional documents such as body maps/ drawings or examples of the child's work if this causes concern. Date the child's work and ensure that the setting and/or details of who was present are also documented on the piece of work.
- Give details of who you have reported the incident to (including time & date).

What happens next?

- **1)** The DSL/DEPUTY DSL will review the Cause For Concern email and decide on the most appropriate action to be taken.
- **2)** The CC will email DSL/DEPUTY DSL and safeguarding inbox to confirm actions taken or no further action.
- **3)** The DSL/DEPUTY DSL will link up with the Case Coordinator.
- **4)** DSL/DEPUTY DSL saves cause for concern email & follow up in the relevant pupils safeguarding file labelled: "**DATE & CHILD/REN'S INITIALS**". *** THIS WILL NOT BE SAVED UNTIL RESPONSE FROM CC IS RECIEVED***
- **5)** The CC will save relevant documentation to carenotes and liaise with Tavi Safeguarding if a referral is made.

APPENDIX 6: 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 with children in school, including volunteers and governors
- 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 to children 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 – 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, e.g. 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.

Record of checks taken out and/or certificates obtained

Camden policy model:

Name	Date of service	Address	DOB	Position held/ <u>regulated</u> 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/document s 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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Gloucester House use the model that was suggested by NASS following training (*‘Making sense of the Single Central Record’*):

Identity checks:			Position details:			Qualifications:		Prohibited list / GTCE list check:	EEA List Check: (Prior to 31/12/2020)	S128 Prohibition from management check:	DBS			Right to work:		Volunteers only:	NOTES:
Taxi Assignment number	Full Name	ID seen:	Start Date	Current pos:	Contract Type	Required (Y/N)	Check completion date:	Date of check:	Date of check:	Date of check:	Enhanced DBS check:	DBS Barred List check: (2006 onwards)	Update Service? Y/N	Date of check:	Overseas check:	Risk assessment completion date:	