



North London
NHS Foundation Trust

Gloucester House: Safeguarding and Child Protection Policy and Procedures

NLFT adopted this policy from Tavistock and Portman NHS Foundation Trust (TPFT) in March 2026 ahead of the merger by acquisition. References in the policy to TPFT structures, links, processes and policies will, from 1 April 2026, usually refer to NLFT.

Version Control

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Policy Author	Gloucester House
Email contact	
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Key changes to policy document

Version	Date	Summary of key changes
1	March 2026	TPFT Gloucester House policy adopted by NLFT. 2 April 2026 – added NLFT Chief Nursing Officer role and nlft.Safeguarding@nhs.net contact details to policy to update from TPFT CNO who has left. One year review period in line with existing policy.

1. Equality Statement

All public bodies have a statutory duty under the Equality Act 2010 to set out arrangements to assess and consult on how their policies and functions impact on equality and fairness.

All policy documents will be equality impact assessed and this will include equality and human rights with regard to the protected characteristics including age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (gender) and sexual orientation.

The Trust will make accessible versions of this document available where requested by members of the public, service users or staff.

2. Trauma Informed Statement

To commit to a trauma informed organisational culture, all policies, practices, and decisions must seek to recognise and respond to trauma, reduce the risk of re-traumatisation and take steps to repair any harm the organisation may cause to those who work within it or use its' services.

3. Vision and Values

We are guided in all we do by our **vision** and **values** and all policies and procedures are written in line with them.

Our **vision** is better mental health, better lives, better communities.

Our **values**:





Safeguarding and Child Protection Policy and Procedures for Gloucester House

The Tavistock Children's Day Unit

Approved on behalf of the Steering Committee by:	Gloucester House Steering Committee Chair & Steering Committee Safeguarding Lead – (Chief Nursing Officer)
Date issued and ratified:	March 2026
Next review:	March 2027 (in line with KCSIE updates)

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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'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
- Children missing or absent from school policy

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 3**

Roles and responsibilities

3.1 Children and Learning Directorate

Whilst we currently have only a small number of Camden children, Gloucester House access the LADO, DSL and staff training from Camden.

Children's Safeguarding and Family Help (CSFH), which includes Early Help services, and Camden Learning will support the school/college to safeguard and promote the welfare of pupils by:

Co-ordinating the delivery of integrated children's services within the borough, including an early help service.

- Providing statutory social work services under the Children Act 1989.
- providing 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 Committee

The Steering Committee 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's legal duties under the Human Rights Act 1998, the Equality Act 2010 and the Public Sector Equality Duty (see Appendix 1).

In particular, the Steering Committee 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 or are absent 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 Committee 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 Committee 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 Committee 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.
- Pupil's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual pupil's 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 (2025)*.

[Keeping children safe in education 2025](#)

- 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. [Safer recruitment and staff conduct policy for schools and colleges](#).
- All staff are able to identify those pupil's 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 pupils for whom there are safeguarding and child protection concerns and can make appropriate referrals to CSFH.
- Staff are able to work in partnership with other agencies to safeguard pupils, including providing early help support, contributing to assessments and the implementation of the pupil's plan, attending network meetings and case conferences, monitoring pupil'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 committee.

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 pupil'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 CSFH, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS) including keeping records of decisions made and the rationale for them;
- Keep the head teacher, senior leadership team and the Steering Committee 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 Committee 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 CSFH

- 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 CSFH 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.
- Always aim to inform parents/carers before making a referral to social care except in instances where it may put the child at risk
- 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:

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* 2024.

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 Committee 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:

[Camden Safeguarding Children Partnership — CSCP — New Safeguarding Arrangements](#)

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*. [when-to-call-the-police--guidance-for-schools-and-colleges.pdf \(npcc.police.uk\)](#)

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 CSFH 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:

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

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-and-assessment-guidance-2024.pdf](#)

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

As schools have a legal basis to share information parental consent is not required for a referral to be made but parents will be informed that a referral is being made and their agreement sought.

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 have experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a Pupil Referral Unit;
 - children who are misusing drugs or alcohol;
 - children at risk of exploitation through modern slavery 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 ie: FGM, forced marriage
 - children who have a parent in prison or who are affected by parental offending;
 - privately fostered children;
 - children who are persistently absent from school including for part of the school day.
- 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, CSFH/MASH team.

4.2.1 Safeguarding referrals

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

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputy as they are most likely to have the most complete safeguarding overview. Following consultation the designated safeguarding lead should decide on whether to make a referral to CSFH via the Contact Service.

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

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

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting under child protection** procedures as set out in section 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 2023*) <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 2025)
- Keeping children safe in education (DFE 2025)

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 CSFH/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 or exploitation and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- Staff should refer to the London safeguarding children procedures for full definitions of abuse, harm and neglect. [CP1. Recognising Abuse and Neglect \(londonsafeguardingchildrenprocedures.co.uk\)](https://www.londonsafeguardingchildrenprocedures.co.uk)
- 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 CSFH.
 - Reassure the child that what has happened is not their fault and that they were right to tell someone.
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- 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 CSFH 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 CSFH social worker, the referral should be made directly to them. If the child is not already known to CSFH, referrals should be made to the Contact team. If the child lives outside Camden, a referral should be made to their home local authority.
- If Gloucester House does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with CSFH/Early Help services 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 CSFH to ensure that all relevant information held by Gloucester House is provided to CSFH 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:
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- 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 Safeguarding concerns are recorded on My Concerns system.

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.

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.

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 CSFH 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 CSFH 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 CSFH.

Schools have a lawful basis for sharing information without parental consent where there are safeguarding risks. 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.

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

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 Committee 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*. 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.

[Health and safety: responsibilities and duties for schools - GOV.UK](#)

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

<p>Lisa Tucker (Tavistock) Contact details: LTucker@tavi-port.nhs.uk</p>

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 CSFH 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 CSFH.

If there are high levels of risk involved in contact with parents/carers, CSFH 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 Committee 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. **This responsibility is delegated to the Estates team, but monitored by the Steering Committee.**
- 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.
- Most building works to the school are carried out by the Trust Estates team during times when the pupils are not present (i.e. before/after school or during holidays). They are always supervised if pupils are in the building.
- In the rare event that contractors are used the head teacher and Steering Committee 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 our 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 and the Steering Committee 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 remain responsible for safeguarding the pupil and will ensure that the setting meets the pupil's needs. 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 will carry out a further risk assessment where they have been notified of any changes to safeguarding arrangements at the alternative provision.

The school will keep records of the expected location of any pupil attending off-site provision during the school day and carry out reviews of alternative provision on a half-term basis to ensure the pupil continues to attend, taking appropriate action where safeguarding issues arise.

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

[Arranging Alternative Provision - guide for LAs and schools](#)

<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 organisation can demonstrate it is able to keep children safe. The Steering Committee/ proprietor will ensure:

- 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 Committee 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)
 - o checks with Prevent Education officer (020 7974 1008)
 - o 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.
- Organisations will be expected to meet the requirements set out in the Department of Education guidance below before the school/college will allow the premises to be used.
- Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings - GOV.UK (www.gov.uk)
- Any allegations arising from incidents happening when the school is being used by another organisation should be dealt with by the school/college under the CSCP *Guidance for schools on dealing with allegations against staff and volunteers*. [Introduction \(cscp.org.uk\)](http://cscp.org.uk)

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 Committee will ensure that;

- All school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and

Steering Committee 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 Committee.
- 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 Committee 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 CSFH.
 - 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 CSFH. Transport issues will be managed by Gloucester House in liaison with & SEN and parents/carers.

B2 Children who are missing or absent 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:

[Children-missing-or-absent-from-education-policy.pdf \(cscp.org.uk\)](#)

CSCP missing children protocol:

[Draft CSCB missing protocol \(cscp.org.uk\)](#)

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 CSFH, their allocated social worker should be notified immediately.*
- *If the child is not known to social CSFH, but the school has concerns about their welfare, the designated safeguarding lead should make a referral to CSFH.*

B3 Child on child abuse

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

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

All incidents of child-on-child abuse will be dealt with under the *Child on child and sexual violence and harassment guidance for schools and colleges*

B4 Harmful sexual behaviour, sexual violence and harassment

- 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.
- All incidents involving sexual violence or sexual harassment between pupils will be dealt with under the *Child on child and sexual violence and harassment guidance for schools and colleges* guidance and the *Harmful sexual behaviour* protocol. [CSCP-harmful-sexual-behaviour-protocol.pdf](#)
- 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 Committee 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.
- 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.

- 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 Committee 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 extremism and radicalisation

The school have a duty to work in partnership to safeguarding children from being drawn into radicalisation and terrorism. This is set out in the

Gloucester House's safeguarding duty includes the duty to promote British values in order to counter the extremist narrative, prevent young people from being drawn into radicalism and to build resilience to radicalisation through the curriculum.

[Promoting fundamental British values through SMSC - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/promoting-fundamental-values-through-sm-sc)

The school/college will follow government guidance and ensure appropriate training for staff and robust filtering and monitoring to IT systems to prevent online radicalisation.

The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK ([www.gov.uk](https://www.gov.uk/government/consultations/prevent-duty-guidance))

The school/college has a duty to identify where a child is at risk of radicalisation and seek multi-agency advice and support via a referral to Camden's Channel Panel.

<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 a household or family member's radicalisation.
- Schools should also consider where a child may be considering mass violence which does not seem to be linked to a specific ideology as a concern which may benefit from Prevent support/advice.
- . 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 these concerns should be shared with the designated safeguarding lead and a decision taken as to whether concerns need to be raised with CSFH for a referral under the Prevent duty for support from the Channel Panel.

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 Programme Manager; safeguarding against radicalisation (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](https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation)

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/wp-content/uploads/2024/08/Model-schools-online-safety-policy-2024.pdf>

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:

[Safeguarding-children-and-young-people-with-disabilities-Guidance-2023.pdf](#)

Where there are concerns about abuse involving a pupil with SEND, the designated safeguarding lead will liaise with the SENDCO. The school/college will consider

extra pastoral support for pupils with SEND including extra help in supporting communication.

Additional procedures

[SEND Policy - ..\1. POLICIES \(GH & TRUST\)\Statutory\GH SEN Procedure.docx](#)

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, CSFH 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 CSFH and who are subject to child in need or child protection plans are likely to have experienced abuse, neglect and trauma and that this could have a negative effect on their behaviour and learning.

CSFH social workers will inform schools whenever a child is receiving a service and the designated safeguarding lead will keep a record of all pupils who have an allocated social worker and children who are living in kinship arrangements.

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

Staff should be aware of the Domestic Abuse Act 2021 and have knowledge of the nature of domestic abuse and the harm it may cause to children who witness incidents, who are now considered to be victims of domestic abuse in their own right. For more details please refer to the CSCP guidance on domestic abuse. [CSCP-domestic-abuse-guidance-2019.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

Pupils who are lesbian, gay, bi or trans (LGBT) or gender questioning

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

The school will exercise caution with regard to children who are questioning their gender. They will take into consideration any guidance issued by the Government, the complexity of the child's situation and the possibility that they may have additional needs and vulnerabilities, whilst also having regard for their safeguarding responsibilities. The school will work in partnership with parents/carers and the child to explore how to best meet the child's needs (unless this would put the child at risk of harm) and support them to seek timely and appropriate clinical advice.

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. They may also be moved into the UK or around other towns and cities in the UK to facilitate their exploitation. The exploitation of the young person is a form of modern slavery and their forced movement is trafficking, both of which are criminal offences.

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

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>

The school/college will adhere to the CSCP guidance *Extra-familial harm and child exploitation* whenever there are concerns that young people are at risk from extra-familial harm or exploitation:

[CSCP-extra-familial-harm-and-child-exploitation-guidance.pdf](#)

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.

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.

[CYP-mental-health-protocol.pdf \(cscp.org.uk\)](https://www.cscp.org.uk/cyp-mental-health-protocol.pdf)

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

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

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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](https://www.gov.uk/government/publications/drugs-advice-for-schools)

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](https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions)

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](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](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: 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 \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/technical-guidance/public-sector-equality-duty)

APPENDIX 2: 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, up skirting 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 or absent 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			
The school has a single central record providing details of when and by whom the following checks on candidates were taken out: <ul style="list-style-type: none"> • Identity checks • DBS/barred list checks • Prohibition from teaching/section 128 checks • Appropriate checks with overseas organisations where the candidate is from abroad <input type="checkbox"/> • Checks to establish right to work in the UK • Professional qualifications check 			
The school has a clear system in place in line with statutory requirements for volunteers or contractors coming into the school, .Enhanced DBS checks are taken out on all staff members, volunteers and governors; barred list checks are also taken out on staff, volunteers and governors who are involved in regulated activity			
The head teacher or other member of the senior leadership team decides on whether or not volunteers, visitors or contractors require a DBS check and this decision is informed by a risk assessment; arrangements are put in place to supervise and oversee volunteers, visitors and contractors where a DBS check is not carried out and children are not left unsupervised with any individual who has not undergone a DBS check			
The school seeks written confirmation from agencies that these checks have been taken out on all agency and supply staff prior to appointment; all agency and supply staff are required to present proof of identity prior to beginning work			
A member of the governing board or senior leadership team involved in interviewing has completed an accredited safer recruitment training course			
Dealing with allegations against staff			
There is a named staff member with responsibility for liaising with the police and LADO for all staff subject to allegations, including supply staff			
Appropriate referrals are made to the DBS where staff cease to work at the school following investigation into allegations			

