

# *Primrose Hill Primary School*



## **Safeguarding Policy**

October 2019

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## Key contacts

### Primrose Hill Primary School

#### Primrose Hill Primary School:

**Headteacher:**

Name: Robin Warren

Contact details: 020 7722 8500

**Designated safeguarding lead:**

Name: Liz Ghamar

Contact details: 020 7722 8500

**Deputy designated safeguarding lead:**

Name: Robin Warren and Amanda Aplicano

Contact details: 020 7722 8500

**Designated LAC teacher:**

Name: Liz Ghamar

Contact details: 020 7722 8500

**Nominated governor for child protection:**

Name: Hilary Aylesworth

Contact details: [hilary.aylesworth@primrosehill.camden.sch.uk](mailto:hilary.aylesworth@primrosehill.camden.sch.uk)

### London Borough of Camden

**Child protection lead officer and Local Authority Designated Officer (LADO):**

Name: Kurt Ferdinand

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**Safeguarding lead officers:**

Name: Michelle O'Regan (Head of Service – Children in Need)

Tel: 020 7974 1905

Name: Jennette Evans (Service manager)

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Name: Patricia Williams (Service manager)

Tel: 020 7974 1558

**MASH team:**

Manager: Jay Fente

Tel: 020 7974 1553/3317

Fax: 020 7974 3310

**E-safety contact officer:**

Name: Jenni Spencer

Tel: 020 7974 2866

**Child and family contact team**

Name: Emma Haigh

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**Prevent Education Officer**

Name: Jane Murphy

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# **I Purpose of policy**

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

## **2 Roles and responsibilities**

### **2.1 Camden Supporting People Directorate**

The Directorate includes Children's Safeguarding and Social Work (CSSW), Early Intervention and Prevention and Education divisions and these services will support our school to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an early help service
- providing statutory social work services under the Children Act 1989
- providing the school with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and e-safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

### **2.2 Governing body**

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

- Primrose Hill Primary School has the following policies in place and these are regularly monitored, reviewed and updated where necessary
  - safeguarding policies and procedures covering early help and child protection that are consistent with Camden Safeguarding Children Board procedures and Camden's internal policies
  - a staff code of conduct including staff/pupil relationships and communications and staff use of social media is available in the School Handbook
  - a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored
- Our nominated governor with responsibility for liaising with Camden CSF on safeguarding and child protection matters, Hilary Aylesworth, will link with the

LADO in the event of an allegation against the head teacher should the Chair of Governors be unavailable

- The designated safeguarding lead is Liz Ghamar, with responsibility for carrying out the statutory duties as set out in this policy. She is given sufficient time and resources to carry out her responsibilities and, in her absence, Robin Warren or Amanda Aplicano is appointed to deputise for her
- There is a designated teacher, Liz Ghamar, nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school and there are robust whistleblowing procedures in place
- Steps are taken to ensure parents and pupils are aware of the school's safeguarding and child protection policies and procedures
- Governors take steps to ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line
- The school has appropriate written procedures in place to ensure safe 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 one member of the governing body has undertaken accredited safer recruitment training
- All staff receive safeguarding and child protection training at least every 2 years and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation
- The school has procedures in place to deal with allegations made against other pupils and pupils who go missing from education
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

## **2.3 The Head teacher**

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

- Staff are inducted thoroughly and have read all the school's safeguarding and child protection policies, Behaviour Policy and CSCB Children Missing From Education Policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies
- All staff are able to identify those children who need extra help and can make appropriate referrals to early help services, however referrals are usually made by the DSL
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and understand the referral procedures in place
- 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 and monitoring progress; the designated teacher attends network meetings, case conferences, core group meetings, liaises with social workers and attends any other meetings held to discuss safeguarding issues concerning pupils at the school

- Safe recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff
- The school offers a safe environment for staff and pupils to learn and raise concerns about poor or unsafe practice
- Appropriate action is taken should an allegation be made against a member of staff
- Safeguarding issues are brought to the attention of the governing body.

## **2.4 Role of the designated safeguarding lead**

The role of the designated safeguarding lead and their deputy is to take lead responsibility for safeguarding and child protection within the school and to be available during school hours for staff to discuss safeguarding concerns. Staff are aware of how to raise concerns, either with Liz Ghamar or Robin Warren during school hours or out of school hours. This can be done by internal phone, face to face, written statement, email or mobile phone.

The designated safeguarding lead (and their deputy) will:

- Liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Channel Panel, or the Police . The Business Manager liaises with the Disclosure and Barring Service (DBS) for checks on all staff and volunteers;
- Keep the head teacher and the Governing Body informed of on-going safeguarding and child protection issues and inquiries;
- Provide advice and guidance for staff on safeguarding and child protection issues and making referrals;
- Ensure the school's safeguarding and child protection policies are up to date and consistent with Camden's Safeguarding Children Board policies and that policies are reviewed annually;
- Ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them;
- Attend regular training, including Prevent Awareness training, and the designated teachers meetings hosted by Camden in order to keep up to date with new policy, emerging issues and local Early Help, safeguarding and child protection procedures and working practices;
- Provide regular updates received from Camden to all staff members and governors on any changes in safeguarding or child protection legislation (updated information will be provided by Camden at the designated teachers meeting and designated safeguarding leads will be responsible for communicating this information to staff immediately; they may decide to hold workshops or discuss in staff meetings);
- Have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENDCo when considering any safeguarding action for a child with special needs;
- Liaise with the designated teacher for LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child;
- Oversee child protection systems within the school, including the management of records, standards of recording concerns and referral processes;

- Provide a link between the school and other relevant safeguarding agencies, particularly CSSW and the Camden Safeguarding Children Board;
- Ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years;
- Ensure parents are fully aware of the school policies and procedures and that they are kept informed and involved as appropriate;
- 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 for the child on their transfer.

## **2.5 Working with parents and carers**

Parents and carers have the main responsibility for safeguarding and promoting their child's welfare and the school recognises the importance of working in partnership with them to ensure the welfare and safety of pupils.

The school will:

- Make parents aware of the school'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 the school web-site or on request;
- Provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff;
- Consult with and involve parents and carers in the development of school policies to ensure their views are taken into account;
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers;
- Provide advice and signpost parents and carers to other services and resources where pupils need extra support.

Additional guidance is available from *the DfE on dealing with issues around parental responsibility*:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/489901/Parental\\_Responsibility\\_Advice\\_for\\_School\\_January\\_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/489901/Parental_Responsibility_Advice_for_School_January_2016.pdf)

## **2.6 Multi-agency working**

The school will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and Working Together to Safeguard Children 2018. The school recognises its vital role in safeguarding school-age children and will co-operate with Camden Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcome for children in Camden.

## **3 Safeguarding children**

Safeguarding is a preventative agenda that helps children to achieve their full potential regardless of negative factors such as poverty, deprivation or social exclusion by providing services and support to overcome barriers to achievement. Most of the children in Primrose Hill School who are subject to a Child in Need Plan or a Child Protection Plan fall under the category of Emotional Abuse and the school works closely with all agencies involved in these cases towards a common aim of achieving the maximum possible wellbeing of the children.

The school will carry out its duty to safeguard pupils and aims to achieve the following:

- 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.

To achieve these aims, Primrose Hill Primary School will:

- Identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating;
- Where the child's extra needs require services from another agency, make a referral to the Early Help service (via the Child and Family Contact team) for appropriate help and support;
- Where the child is receiving an Early Help service, work as part of the Team around the Child and take up the role of lead professional where this is appropriate;
- Identify children who may be suffering from significant harm and make a child protection referral to CSSW (via the Child and Family Contact team who will pass referrals on to the MASH);
- Share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs;
- Refer to Camden's thresholds and eligibility criteria ( [Safeguarding children - Camden Council](#) ) to help make decisions on the child's level of need and the appropriate service to refer on for services.

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

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

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

### **3.1 Early Help cases**

Staff will identify children who need 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 require early help:

- Children with disabilities and additional needs, including those with special educational needs
- Young carers
- Children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime
- Children who frequently go missing from home, school or care
- Children who are misusing drugs or alcohol



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

### 3.2 Referral for a statutory social work service

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the Designated Safeguarding Lead or their deputy, who are most likely to have the most complete safeguarding overview. Following consultation the designated safeguarding lead should decide on whether to make a referral to CSSW via the Contact Service. Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Camden's MASH team to gather relevant information from other agencies. In Primrose Hill School we would ring MASH in the first instance for advice and together make the decision whether to refer directly to them or refer to Early Help

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

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

## 4 Child protection procedures

### 4.1 Role of Primrose Hill Primary School

The school 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 2015)  
[Working together to safeguard children - Publications - GOV.UK](#)
- What to do if you're worried a child is being abused (DfE2015)  
[What to do if you're worried a child is being abused - Publications - GOV.UK](#)
- The London Safeguarding Children Board child protection procedures  
[London Safeguarding Children Board: Child Protection Procedures](#)

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

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

#### **4.2 Recognition**

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead;
- Staff should refer to appendix I for a full definition of significant harm and the specific indicators that may suggest a pupil may be at risk of suffering significant harm;
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where required, advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.
- Concerns may be monitored over time and recorded on the monitoring/incident form shown at appendix 2. These details are also logged on the school's CII database. *Details of any concerning incidents should also be recorded.*

#### **4.3 Dealing with disclosures**

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

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

- Explain what will happen next and who has to be told;
- Make a formal record and pass this on to the designated safeguarding lead.

#### **4.4 Referral**

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

#### **4.5 Attendance at case conferences and core groups**

- The designated safeguarding lead will liaise with CSSW to ensure that all relevant information held by the school/college is provided to CSSW during the course of any child protection investigation;
- The designated safeguarding lead will ensure that the school is represented at child protection case conferences and core group meetings;
  - The designated safeguarding lead (or their deputy) will attend, with, if necessary another member of staff;
  - 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.

#### **4.6 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 the CII database under the appropriate heading prior to each conference and core group meeting;
- The completed monitoring form will be printed from the database and 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;
- The designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

#### **4.7 Records**

- Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the school;
- 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 section of the CII database and all records should be dated and signed as appropriate;
- Records should show:
  - What the concerns were;
  - What action was taken to refer on concerns or manage risk within the school;
  - Whether any follow-up action was taken;
  - How and why decisions were made.
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken;
- a CII report 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.
- Where a child who is subject to a child protection plan transfers to another school, the designated safeguarding lead is responsible for ensuring that copies of all relevant records are passed to the designated safeguarding lead at the new school;
- Child protection records will only be kept until the pupil leaves the school and should be disposed of as confidential waste.

#### **4.8 Confidentiality and information sharing**

- All information obtained by school staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent;
- If the child is under 12, consent to share information about them must be obtained from their parents or carers;
- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with CSSW and make appropriate referrals. Equally,

where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by CSSW;

- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents made aware of this. Before taking this step, schools and colleges should consider the proportionality of disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the Child and Family Contact team social worker on a “no names” basis to gain advice on whether this course of action should be taken;
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure, and remind recipients that the information is confidential and only to be used for the stated purpose;
- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school’s duty to share information;
- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the Child and Family Contact team social worker.

## **5 Early Years settings within schools**

### **5.1 Legal and policy framework**

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

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

### **5.2 Safeguarding and child protection**

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

Early Years settings within the school will follow the child protection procedures set out in Section 4 of this policy. In addition, the school has the following child protection policies and procedures:

- In relation to the use of mobile phones within the early years setting we will ensure:
  - parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile;

- parents are generally prohibited from taking any photographs of children in the early years setting, however for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared, and providing there are no objections from any other parents attending whose children are taking part in the event;
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose;
- Staff switch off personal mobile phones in the early years setting and use them only during breaks outside the setting.

### **5.3 Suitable people**

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

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

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

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

### **5.4 Staff training, skills and supervision**

The school will ensure that:

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

### **5.5 Staff ratios**

The school will ensure that staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe. Children will be kept within sight and hearing at all times.

For nursery classes:

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

For reception classes:

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

Parents will be kept informed of staff members and numbers.

## **5.6 Health**

The school will:

- Promote the health of children attending the early years provision;
- Take necessary steps to stop the spread of infection;
- Administer medicines only in line with the school's policy;
- Take appropriate action where children are ill;
- Ensure any meals provided are nutritious and prepared in a hygienic manner;
- Notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days.

## **5.7 Health and safety and suitability of premises**

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

The school has specific policies for ensuring that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

# **6 Safe recruitment**

## **6.1 General principles**

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

The school/college will follow the *Keeping children safe in education* guidance (DfE 2016).

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

- Primrose Hill School will carry out extensive checks and inquiries on applicants for all positions, including voluntary and support roles and governors, in accordance with statutory requirements;
- No staff member, volunteer or governor will be allowed to take up posts until all checks and inquiries have been satisfactorily completed;
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school (see section 6.4);
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be expected to agree to undergo DBS and other checks as part of safe recruitment practices;
- Staff and governors who normally sit on interview panels will be trained in safeguarding interviewing techniques and no interview should go ahead unless at least one member of the panel has undertaken safe recruitment training;
- Although the head teacher will have day-to-day responsibility for the recruitment of staff, the Governing Body will ensure that they maintain an overview of recruitment systems in order to scrutinise practice and ensure all statutory checks are carried out;
- Staff with responsibility for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen;
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity;
- The head teacher will be responsible for ensuring the Business Manager keeps an up to date single central record of all staff and volunteers who work at the school and it includes details of all checks carried out and the outcome of these checks or any certificates obtained;
- Where staff are recruited via third parties such as employment agencies, the head teacher and the board of governors will seek written confirmation from the agency that the agency has carried out all necessary checks on the individual, request written confirmation of the outcome of all checks and ask to see the DBS disclosure prior to making any decision regarding the individual's employment. They will also check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

## **6.2 Checks to be taken out**

The school will:

- Verify the applicant's identity from their passport or other photographic ID and receive current proof of address;
- Evidence the applicant's right to work in the UK through documentation. Only original documentation will be accepted and its validity checked in the presence of the applicant;
- Carry out an enhanced DBS check, which will include information from the barred list when the applicant will be involved in regulated activity. If the applicant must begin work before an enhanced DBS check can be completed, a barred list check will be obtained;



- In the case of teaching staff, check the applicant's academic and vocational qualifications and make further checks on TRA Teacher Services system to ensure they are not prohibited from teaching under a teacher prohibition order;
- Where the applicant has been living abroad, make similar inquiries in the country of origin relating to the applicant's qualifications and suitability to teach via the NCTL Teacher Services system.

Additional central government guidance is available at: [Criminal records checks for overseas applicants - Publications - GOV.UK](#)  
[Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK](#)

- If a candidate applying for a teaching post is not currently teaching, the school will contact their former school to inquire about their reasons for leaving;
- Make inquiries regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role;
- Ask applicants to provide a full employment history and details of at least 2 referees, including previous and recent employers. All references will be taken up prior to appointment and will be requested directly from the referee.

### **6.3 References**

- Applicants will be asked to provide a full employment history and details of at least 2 referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References from colleagues will not be acceptable;
- All references will be taken up prior to interview and will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided.
- References will be taken up from current employers only; if the applicant is not currently employed, verification of will be sought from their previous school as to the dates the applicant was employed and the reasons for leaving the post.
- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source
- All job offers will be subject to the school receiving satisfactory references. Referees will be contacted to resolve any issues that emerge from the references provided;
- Copies of the following documents will be kept:
  - Documents used as proof of identity such as passports or driving licences;
  - A summary of the DBS certificate on the single central record (but all other documents relating to the DBS check must be destroyed);
  - Documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).

### **6.4 DBS checks**

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

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

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

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

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

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

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

Contractors who work on site whilst the children are in school are asked to provide evidence that their employees are DBS checked. We also ask contractors to include in their job descriptions that the company is committed to the safeguarding of children.

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

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

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

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

## **6.5 Volunteers**

Parents who occasionally accompany pupils on school outings will never be left alone with a group of children and staff leading the trip will clarify this requirement and why it is essential, before the class leave for the trip. The head teacher will ensure that the following are carried out in relation to unpaid volunteers providing help in the classroom:

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

## **6.6 Governors**

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

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

## **6.7 Alternative education provision**

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

## 6.8 Disqualification by association

Primrose Hill School will implement the Childcare (Disqualification) Regulations 2009 by ensuring that staff who are disqualified by association because they live in the same household as a person disqualified under the Childcare Act 2006 are not able to work in an early years setting within the school.

To do this the school will follow the statutory guidance “Disqualification under the Childcare Act 2006”:

[Disqualification under the Childcare Act 2006 - Publications - GOV.UK](#)

The school will also implement the “Childcare Disqualification Requirements Management Guidance” provided by Camden available at: [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Board](#)

Policy

Safe Recruitment and Selection Policy

## 7 Staff practice and conduct

### 7.1 Induction and training

- The head teacher will ensure that all staff are fully inducted, are made aware of the school’s safeguarding and child protection policy and procedures and that staff are fully aware of their role in implementing these and the following:
  - Behaviour Policy
  - Physical Restraint Policy
  - Staff Code of Conduct (see the Staff Handbook)
  - Children Missing from Education Policy
- Staff will be asked to confirm in writing that they have read all relevant staff policies, including “*What to do if you are worried a child is being abused*” guidance;
- The designated safeguarding lead will ensure that all staff are fully inducted with regard to the school child protection procedures and that they receive safeguarding and child protection training on a two-yearly basis;
- The head teacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers;
- School staff and governors will receive multi-agency safeguarding training provided by Camden Safeguarding Children Board at the relevant level;
- As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses;
- School staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation, including a termly Safeguarding Newsletter.

## 7.2 Conduct and safe teaching practice

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

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

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

Policy:

Social Media Policy

## 7.3 Providing intimate or personal care to pupils

Staff in primary schools may need to provide intimate or personal care to younger pupils, for example helping a child who has soiled themselves or supervising pupils who are changing for P.E. (e.g. swimming)

The school has a written policy in place in order to promote safe working practices for staff and ensure children's privacy. Children should be encouraged to carry out self-care tasks for themselves where appropriate, but where adult intervention is needed, the following should be observed:

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

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

Primrose Hill School has a behaviour management policy in line with government guidance and any use of physical intervention and restraint is linked to the implementation of the school's Physical Restraint Policy.

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

*Guidance from the Department of Education provides schools with the powers to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at: [Behaviour and discipline in schools - Publications - GOV.UK](#)*

**However, Camden strongly advises schools:**

- not to carry out non-consensual searches of pupils or their bags. (However electronic devices may be searched without consent or parental permission if there is a suspicion that the device has been used to: cause harm, break school rules, commit an offence, cause personal injury, disrupt teaching or damage property);
- only to use reasonable force where there is a risk of harm to the pupil or others or a risk of substantial damage to property

Schools should be familiar with Camden's local policies on bullying, use of physical restraint and guidance on carrying out searches of pupils.

## **7.5 Allegations against staff**

In the event that an allegation is made against a member of staff or volunteer, the school will follow Camden's "*Guidance for the management of an allegation against a member of staff*".  
[Policies / Guidance | Camden Safeguarding Children Board](#)

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

All allegations in relation to staff members will be referred to the head teacher; allegations against the head teacher will be referred to the Chair of the Governing Body, or, in their absence, Ophelia Field, the Safeguarding Governor.

Where a staff member is removed or resigns from the school prior to or following the upholding of an allegation against that person and the responsible staff member and the LADO agree that the person is unsuitable to work with children, the responsible person will refer the individual to the DBS.

The DBS referral form and guidance for completing the form can be accessed on line via the DBS website at:

[Disclosure and Barring Service: criminal record checks, referrals and complaints - Detailed guidance - GOV.UK](#)

## 7.6 Whistleblowing

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

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

All staff and volunteers have a legal duty to raise concerns where they feel individuals or the school is failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the school, staff and volunteers may report concerns to the following;

- Camden’s lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil;
- The following numbers can be used where there are issues regarding the school’s overall procedures around safeguarding
  - Camden Council’s confidential and independent help-line for protected disclosure on **0800 734 199**
  - the Ofsted whistle-blowing line on **0300 123 3155**
  - the NSPCC whistleblowing helpline on **0800 028 0285**.
- The head teacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

### Additional policies:

Whistleblowing Policy  
Code of Conduct (Appendix B in the Staff Handbook)  
Behaviour Policy  
Physical Restraint Policy  
Medical Policy  
Intimate Care Policy  
Managing Allegations against Pupils

## 8 Health and safety and risk assessments

### 8.1 Responsibility for health and safety

The governing body and head teacher 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.

The health and safety policy adapted by the school is based on the government guidance (link below) and seeks 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/279429/DfE_Health_and_Safety_Advice_06_02_14.pdf)

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

**Name: Giuseppe Zecca**  
**Designation: Site Services Officer**  
**Contact details: 07709 021 979**

## **8.2 Risk assessments**

Risk assessments are a method of:

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

The school carries out risk assessments:

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

## **8.3 Working with aggressive and violent parents**

It is inevitable that parents who are involved with CSSW may become frustrated, angry or hostile; this is a very common reaction as parents are fearful of their children being removed from their care and from the level of stress that CSSW intervention is likely to cause to their family. Such a reaction may be reflected in a mistrust of other agencies working with the child.

CSSW is aware of the impact of parental hostility on schools and take the matter very seriously; any threats against a member of the child's professional network must be examined in order to ensure the safety of the whole network, and may provide an important indication of risk to the child.

Where the school is working with families who are known to CSSW and there are concerns about the behaviour of parents towards members of school staff, this will be shared with CSSW.

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



## **8.4 Site security and visitors**

- The board of governors is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage;
- The head teacher 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 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 school identity fob 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 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's policies;
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards;
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils.

## **8.5 Use of the school premises by other organisations**

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

## **8.6 Monitoring and review**

To enable the school to monitor the safety of the premises and the school environment, as well as the implementation of policies, the head teacher and the Governing Body will ensure that:

- All school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and governing body;
- the school 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 has an overview all accidents/incidents;
- serious accidents and incidents are reported to the Governing Body;
- 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 Governing Body to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

## **9 Additional safeguarding policies**

### **9.1 Non-collection of children from school**

The school has a policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide the details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the parent gives details of at least two people who can be contacted in an emergency in the event that the child is uncollected. Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual.

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

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

- The school will check with the child to see if there are any changes to arrangements for collection and try to make contact with the parent or other family members, and wait with the child until someone comes to collect them;
- Children will not be released into the care of another parent even where they offer to take the child home;
- The school will put CSSW on notice at 4.00 pm if there are difficulties in contacting parents or other family members;
- If no contact can be made with the parent by 4.30pm, the school will contact the CSSW assessment team who will arrange for a social worker to collect the child or make arrangements for the child to be transported to the CSSW office;
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so;

- Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead and reported to the Education Welfare Service. If there are also child protection concerns, a referral should be made to CSSW.

#### **Additional policies:**

The Collection of Late Children from School

## **9.2 Children who are missing from education or home educated**

*The school is aware of those children who are persistently absent or missing from school as this may be an indicator of welfare concerns.*

Our Attendance policies state clearly who needs to be notified and what action should be taken and any relevant timescales. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected. Schools should refer to Camden's "Children missing from education" policy and the CSCB missing children protocol for further details available at: [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Board](#)

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

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

## **9.3 Children who harm other children (peer on peer abuse)**

Where a pupil's behaviour causes significant harm to other pupils, for example through violent or sexually abusive behaviour, the school will refer the perpetrator and victim to the Child and Family Contact team under the *Children who harm other children* protocol (see box below)

Where the harm is attributable to sexually abusive behaviour or sexual harassment, the school will follow the CSCB Harmful sexual behaviour;

#### **Additional Protocol:**

Children who harm other children:

: <http://calthorpeproject.org.uk/wp-content/uploads/2010/11/Children-who-harm-other-children-protocol.pdf>

Sexually harmful behaviour in children and young people: multi-agency guidance and protocol 2018:

[https://cscb-new.co.uk/downloads/policies\\_guidance/local/Children%20who%20harm%20other%20children%20protocol.pdf](https://cscb-new.co.uk/downloads/policies_guidance/local/Children%20who%20harm%20other%20children%20protocol.pdf)

## **9.4 Harmful sexual behaviour, sexual violence and harassment Policy**

- Primrose Hill School 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 the school's approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment;
- The school 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;
- The school will take all necessary steps to put in place a preventative programme via the PHSE curriculum in order to convey the school/college's policy and promote respectful behaviour between pupils with regards to sexual conduct;
- The school will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school and appropriate referrals made to the police and CSSW;
- The school will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff;
- The school will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

## Procedures

- Primrose Hill School will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the Keeping children safe in education statutory guidance;
- 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, the school will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance Searching, screening and confiscation advice for schools  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674416/Searching\\_screening\\_and\\_confiscation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf)
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the school will respond to the incident;
- Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the CSCB Harmful sexual behaviour protocol. The designated safeguarding lead may take advice from MASH social workers before making a decision. Possible outcomes include referral to Early Help Services, CSSW or the police, or managing the matter internally under school Behaviour Policies;
- Where a referral will be made to CSSW or the police under the protocol, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents;
- The school will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing

classrooms. These decisions will be reviewed in the light of on-going police and CSSW investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator;

- Where necessary and appropriate, the school will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf under the Harmful sexual behaviour protocol.

## **9.5 Prevention of radicalisation**

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

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](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 also has a duty to refer young people on to Camden's Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/417943/Prevent\\_Duty\\_Guidance\\_England\\_Wales.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417943/Prevent_Duty_Guidance_England_Wales.pdf)

If the 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 school will follow the guidance set out in the CSCB guidance "Safeguarding children and young people from radicalisation and extremism" available at: <http://www.cscb-new.co.uk/wp-content/uploads/2016/03/CSCB-guidance-on-radicalisation-and-extremism.pdf>

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

The school'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 the Police Prevent Engagement Officer (Mark Fowler, [Mark.P.Fowler@met.pnn.police.uk](mailto:Mark.P.Fowler@met.pnn.police.uk) or call 0208 733 6014) and Camden's Prevent co-ordinator (Karina Kaur, [karina.kaur@camden.gov.uk](mailto:karina.kaur@camden.gov.uk) or call 020 7974 6050) or the Prevent Education Officer (Jane Murphy [jane.murphy@camden.gov.uk](mailto:jane.murphy@camden.gov.uk) or call 020 7974 1008).

## **9.6 Mandatory reporting of Female Genital Mutilation (FGM)**

The school will follow the statutory guidance on FGM available at:

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

Where a pupil makes a disclosure of FGM, the school/college will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the CSCB guidance available at:

<http://www.cscb-new.co.uk/wp-content/uploads/2015/10/FGM-mandatory-reporting-guide.pdf>

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

## **9.7 Online safety**

As part of its duty to provide a safe learning environment and ensure pupils know how to remain safe online, Primrose Hill School has implemented the recommendations of Camden's model schools e-safety policy [eSafety | Camden Safeguarding Children Board](#)

## **9.8 Looked after and previously looked after children and care leavers**

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

The school's designated teacher for LAC and care leavers 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.

The school is aware of the new duty to promote the education of previously looked after children (defined as children who have left the care system as a result of adoption or special guardianship order). We recognise that these children may face the same difficulties and have the same vulnerabilities as looked after children.

## **9.9 Children with special education needs or disabilities (SEND)**

Primrose Hill School 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 communication difficulties and professionals may miss vital indicators.

School policies reflect this and recognise that staff need to be able to help this group to overcome barriers to seeking help. The school will follow the CSCB guidance Safeguarding children with disabilities available on their website.

### **Additional procedures:**

The Special Educational Needs and Disabilities Policy  
Equalities Policy and Procedures

## **10 Safeguarding vulnerable groups**

Some children are living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes. Some may need help or intervention from Early Help Services, CSSW or other agencies in order to overcome problems or keep them safe. Staff should be aware of the following groups and supporting policies so that they are able to respond to the needs of these vulnerable groups.

## **10.1 Children at risk of forced marriage**

Any young person who is being forced into a marriage that they do not consent to will be the victim of child abuse and should be protected. They are likely to be in conflict with their family and may have little trust of adults, especially those from their own community. The family may have made plans to take the young person abroad for the marriage and once this has happened, it becomes more difficult for the authorities in the UK to intervene.

The Forced Marriage Unit of the Foreign and Commonwealth Office has issued guidance for agencies on what action to take when there is reasonable cause to believe a young person may be being forced into marriage. Chapter 7 deals exclusively with the role of schools.

Where schools are concerned or aware that a young person is about to be taken out of the UK for the purposes of a forced marriage, they should notify CSSW immediately. The family should not be notified or approached in any way. Schools should remain aware of a family's plans to go overseas for a period of time, and also if an older sibling has been known to have been forced to marry.

*Forced marriage - Detailed guidance - GOV.UK*

## **10.2 Young people living with domestic abuse and/or sexual violence**

Some young people may be at risk because of parental domestic abuse or violence or because they are involved in a violent relationship themselves. Schools can refer young people affected by domestic or sexual violence to the specialist worker based in the Camden Safety Net on **020 7974 1864** for advice and support.

## **10.3 Privately fostered children**

A privately fostered child is a child or young person aged up to 16 who is cared for by someone who is **not** a parent or close family member such as a grandparent, aunt, uncle or sibling, and where the care arrangement will last more than 28 days.

Private fostering is a private arrangement between parents and the carer and normally happens where parents are working or studying away or a child is sent to the UK to live with family friends or distant relatives. In general, privately fostered children are well cared for but some arrangements may be a cover for trafficking.

All private fostering arrangements must be notified to the local authority and Camden has a duty to visit a privately fostered child in order to safeguard their welfare. Schools have a legal duty to notify the local authority 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.

## **10.4 Young carers**

Young carers are children who frequently take on responsibility for looking after parents or younger siblings, carrying out household tasks such as cleaning and cooking beyond what would normally be expected of a child of their age. This may be due to parental disability or ill health. Being a young

carer can severely restrict a child's life and can lead to poor educational outcomes and social isolation.

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](http://www.family-action.org.uk)

## **11 Contextual Safeguarding for young people**

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

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

### **11.1 Children at risk of sexual exploitation**

This describes situations where a young person takes part in sexual activity either under duress or in return for goods, food or accommodation. It normally takes place in the context of an exploitative relationship where there is a power imbalance between the young person and their abuser, for example a much older boyfriend. Often the young person is not aware that they are being abused, but a feature of the exploitation is that the young person cannot be said to have given proper consent.

Child Sexual Exploitation | Camden Safeguarding Children Board

### **11.2 Young people at risk from gang activity or serious youth violence**

Some young people may be at risk either because they are involved in gang activity or because they become a victim of gangs. Gang members may also be putting younger siblings at risk of violence from rival gangs, or younger siblings may be being groomed into the gang culture. Female siblings in particular may be at risk of sexual exploitation or sexual violence.

For more information, schools can refer to the Department for Education guidance.

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

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

### **11.3 Modern Slavery and Trafficked children**

Some children may have been illegally brought into the UK for the purposes of commercial gain, for example as domestic servants or forced labour. They will be heavily controlled by their exploiters and likely to be moved frequently in order to avoid detection by the authorities.



To avoid suspicion, traffickers may enrol a child on entry to the UK posing as a family member but remove the child from school shortly after. Schools need to be aware of any child who suddenly “disappears” off the school roll with no prior explanation, or applications for a place at the school for several unrelated children from the same address.

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

[https://cscb-new.co.uk/?page\\_id=7271](https://cscb-new.co.uk/?page_id=7271)

## 11.4 Children who run away/go missing

Running away is a dangerous activity that puts children at risk. Schools need to be aware of the Camden Safeguarding Children Board guidance on missing children so that they are clear of their role in helping to locate missing children and actions the school can take to help them reintegrate into school on their return.

If schools are worried about a child or young person who is thinking about running away, they can refer the young person to the Barnardo's project on **020 7700 2253** for support to help them to deal with issues and stop them running away.

Schools should also be aware that going missing is an indicator of other issues, such as child sexual exploitation, gang activity and trafficking.

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

## 12 Other relevant safeguarding policies

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

Alternative provision

[Alternative provision - Publications - GOV.UK](#)

Anti-discrimination & harassment

Attendance

[Parental responsibility measures for behaviour and attendance - Publications - GOV.UK](#)

Behaviour and discipline

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

Bullying (including cyberbullying)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288444/preventing\\_and\\_tackling\\_bullying\\_march14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288444/preventing_and_tackling_bullying_march14.pdf)

Children missing from school

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/268987/cme\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268987/cme_guidance.pdf)

Child sexual exploitation

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/278849/Safeguarding\\_Children\\_and\\_Young\\_People\\_from\\_Sexual\\_Exploitation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/278849/Safeguarding_Children_and_Young_People_from_Sexual_Exploitation.pdf)

Complaints

Domestic violence

Drugs/substance misuse

[Drugs: advice for schools - Publications - GOV.UK](#)

Educational visits

Equality and diversity

Exclusion of pupils

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/269681/Exclusion\\_from\\_maintained\\_schools\\_academies\\_and\\_pupil\\_referral\\_units.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/269681/Exclusion_from_maintained_schools_academies_and_pupil_referral_units.pdf)

Fabricated or induced illness

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/277314/Safeguarding\\_Children\\_in\\_whom\\_illness\\_is\\_fabricated\\_or\\_induced.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf)

Faith abuse

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

First aid and administration of medicines

Supporting children with medical conditions

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

Gender based violence, violence against women and girls

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](#)

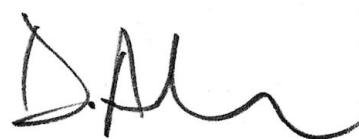
SRE

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/1177033/DFE-00084-2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1177033/DFE-00084-2011.pdf)



David Adams, Chair of Governors  
Safeguarding Governor

## CHILD PROTECTION; DEFINITIONS AND INDICATORS

### Definitions

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

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

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

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

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

### Possible indicators of abuse and neglect

<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Inadequate or inappropriate clothing</li> <li>• Appears underweight and unwell and seems constantly hungry</li> <li>• Failure to thrive physically and appears tired and listless</li> <li>• Dirty or unhygienic appearance</li> <li>• Frequent unexplained absences from school</li> <li>• Lack of parental supervision</li> </ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"> <li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>• High frequency of injuries</li> <li>• Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"> <li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</li> <li>• Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li> <li>• Continual, inappropriate or excessive masturbation</li> <li>• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>• Unwillingness to undress for sports</li> </ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"> <li>• Developmental delay</li> <li>• Attachment difficulties with parents and others</li> <li>• Withdrawal and low self-esteem</li> </ul>
<b>Indirect indicators of abuse and neglect</b>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Withdrawal and low self-esteem</li> <li>• Eating disorders</li> <li>• Aggressive behaviour towards others</li> <li>• Sudden unexplained absences from school</li> <li>• Drug/alcohol misuse</li> <li>• Running away/going missing</li> </ul>
<b>Parental attributes</b>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> <li>• Domestic violence</li> <li>• Avoiding contact with school and other professionals</li> </ul>

## Appendix 2: **School Incident / Report Form**



Primrose Hill Primary School

**Date:** x

**Pupils Name:** x

**DOB:** x

**Class:** x

**SEN Status:** x

**Attendance:** x

**Punctuality:** x

**Academic Achievement:** x

**Behaviour and Relationships (peer and adult):** x

**Presentation (including emotional presentation and physical appearance):** x

**Parents' Engagement:** x

**Concerns:** x

