



**2021-2022**

**SAFEGUARDING AND CHILD PROTECTION  
POLICIES AND PROCEDURES**

**Author/reviewer responsible: OR Reviewed**

**by: MP, AG and CC**

**Last amended: 25.09.20**

**Date of next review** including the annual review of policy and its implementation by governance: **August 2022**

Signed by:

A handwritten signature in black ink, which appears to read 'G. Hawkins'. The signature is written in a cursive style with a large initial 'G'.

Date: 27 February 2021

Relevant Acronyms.

This policy document refers to several acronyms outlined below:

**CSPD** -Camden Supporting People Directorate  
(incorporates Education (Camden Learning), Social work (Adults and Children's) and parts of Housing (Housing support))

**CSSW** –Children's Safeguarding and Social Work

**LADO** – Local Authority Designated Officer

**MASH** team – Multi-agency Safeguarding Hub

**CSCP** – Camden Safeguarding Children Partnership

**ISSRs**- Independent School Standards Regulations

**DBS** – Disclosure and Barring Service (CRB)

**(e)CAF** – Electronic Common Assessment Framework

**DP** – Designated Person

**DSL** – Designated Safeguarding Leader

**SMT** – Senior Management Team

**TRA** – Teaching Regulation Agency

**HSA** – Health and Safety Administrator

**LAC** – looked after child

**CSF** – Children, schools and families

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## **Key contacts**

### College

**Proprietor:** Dukes Education Group Ltd

#### **Chair of Governors**

Name: Aatif Hassan

Contact details: 0203 696 5300 [info@dukeseducation.com](mailto:info@dukeseducation.com)

#### **Nominated Governor for Safeguarding:**

Name: Glenn Hawkins

Contact details: 0203 696 5300 [info@dukeseducation.com](mailto:info@dukeseducation.com)

#### **Principal:**

Name: Candida Cave

Contact details: 0207 586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

#### **Head:**

Name: Emmy Schwieters

Contact details: 0207 586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

#### **Vice Principal:**

Name: Margaret Park

Contact details: 0207 586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

#### **Designated safeguarding and LAC lead:**

Name: Becky Hayes (Director of Studies)

Contact details: 0207 586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

#### **Deputy designated safeguarding lead:**

Name: Leanne Slavin (Director of Studies Lower School)

Contact Details: 020 7586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

**Deputy designated safeguarding lead:**

Name: Leanne Slavin (Compliance Officer)

Contact Details: 020 7586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

**London Borough of Camden**

**Camden safeguarding Children Partnership**

**Camden Council**

Name: Martin Pratt

**Camden Clinical Commissioning Group (CCG)**

Name: Sarah Mansuralli

**North Central Borough Command Unit (BCU) of the London Metropolitan Police Service**

Name: Chief Supt. Raj Kohli

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

Name :Kurt Ferdinand

Contact details: 020 7974 4556

**Safeguarding lead officers:**

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

Tel: 020 7974 1905

Name: Patricia Williams (Service manager)

Tel: 020 7974 1558

**Children's Contact service**

**Multi-agency safeguarding hub (MASH) team:**

Manager: Jade Green

Tel: 020 7974 1553/3317

Fax: 020 7974 3310

**Early Help/CAF team:**

Name: Emma Haigh

Tel: 020 7974 8791

**E-safety contact officer:**

Name: Jenni Spencer

Tel: 020 7974 2866

**Camden missing children**

Name: Sona Ruparell

Tel: 0207 974 4596

Email: [sona.ruparell@camden.gov.uk](mailto:sona.ruparell@camden.gov.uk)

**Prevent Education Officer**

Name: Jane Murphy

Tel: 020 7974 1008

**Police Prevent Engagement Officer**

Name: Mark Fowler

Tel: 0208 733 6014

**UK anti-terrorism**

0800 789321

**Non-emergency Police**

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DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors :  
020 7340 7264 and [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)).

**Sapphire unit** (for reporting FGM to police) 0208 733 5999

## **1. Introduction and purpose of policy**

Fine Arts College is a co-educational, independent establishment teaching yr 9 through to yr13.

Safeguarding is everyone's responsibility. Fine Arts College is committed to safeguarding all its students and promoting a safe and friendly environment which enables all students to access the curriculum.

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. The college will meet its statutory duty to promote the welfare of children and help them to achieve good outcomes.

The college will achieve this by providing a safe learning environment and ensuring college staff have the skills and knowledge to take action where children are in need of help or protection.

This policy has regard to the following legislation:

- 1.1.** Keeping Children Safe in Education (September 2019) (KCSIE)
- 1.2.** What to do if you're worried a child is being abused (March 2015)
- 1.3.** Working Together to Safeguard Children (April 2018) (WT)
- 1.4.** Information sharing (March 2015)
- 1.5.** Prevent Duty Guidance: for England and Wales (March 2015) (Prevent).
- 1.6.** The Prevent duty: Departmental advice for schools and childminders (June 2015)
- 1.7.** The use of social media for on-line radicalisation (July 2015)

## **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 the school/college to safeguard and promote the welfare of pupils by:

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

## 2.2. Governance

The proprietor and those responsible for governance will ensure that the college meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place and fully implemented:

- 2.2.1. The college has the following policies in place and that these are regularly monitored and updated where necessary and annually reviewed;
  - safeguarding and child protection policies and procedures that are consistent with Camden Safeguarding Children Partnership procedures,
  - A staff code of conduct policy including policies covering staff/student relationships and communications, staff use of social media and prevention of radicalisation.
  - 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.
- 2.2.2. The college works 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 students' plans are implemented and monitored.
- 2.2.3. There is a nominated governor (Glenn Hawkins) with responsibility for liaising with Camden CSF on safeguarding and child protection matters and who links with the LADO immediately or within one working day and, in serious cases, the police in the event of an allegation against the principal and/or Head. This contact should be made without the Principal and/or Head being informed.
- 2.2.4. A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities

and that another member of staff is appointed to deputise in his or her absence.

- 2.2.5. There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- 2.2.6. The DSL and Deputy DSLs receive designated person safeguarding and child protection training every 2 years
- 2.2.7. All Staff receive a thorough induction including the FAC Child Protection and safeguarding policy and procedures; FAC staff safeguarding code of conduct; FAC Learning and teaching policy; FAC Behaviours and Sanctions policy FAC Health and Safety policy ;FAC E-safety policy, Part 1 and Annex A of KCSIE (September 2019). They also do online training in child protection and the Prevent duty and GDPR and are given a card with name and contact details of DSL and DDSLs, MASH and whistleblowing hotline. The records of training for these policies are maintained by the DSL. Tim Lyne maintains records of all Health and Safety records.
- 2.2.8. Steps are taken to ensure parents and students are aware of the college's safeguarding and child protection policies and procedures.
- 2.2.9. Governors take steps to ensure students are given opportunities within the curriculum to learn how to keep themselves safe, including on-line safety. These areas are delivered through wellbeing and enrichment classes as well as through the personal tutorial system.
- 2.2.10. Governors ensure the college has appropriate filters and monitoring systems in place to limit students' exposure to online risks.
- 2.2.11. The college has appropriate written procedures in place to ensure safe recruitment practices, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service and TRA as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- 2.2.12. At least 1 member of the governing body has undertaken safer recruitment training.
- 2.2.13. All staff receive safeguarding and child protection training at least every 2 years. All staff receive regular updates, but at least annually, in child protection and safeguarding developments
- 2.2.14. The college has procedures in place to deal with allegations made against other students and students who go missing from education.
- 2.2.15. Students' wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual students and there is a robust system in place for gaining feedback from students.

### **2.3. The Principal**

The principal will ensure that the college meets its statutory duties with regard to safeguarding and protecting students by ensuring the following are in place:

- 2.3.1. The Principal,(and in her absence the Head) has responsibility for liaising with Camden CSF on safeguarding and child protection matters, and in the event of an allegation against the DSL, contact the LADO immediately or within one working day and, in serious cases, the police.
- 2.3.2. The college is able to work jointly with other agencies in order to ensure students can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored. All staff are able to identify those children who need extra help and can make appropriate referrals to early help services. All children have a personal tutor that they see on a weekly basis and which allows staff to monitor wellbeing. The SEND Coordinator oversees all EHC plans for students with special educational needs.
- 2.3.3. Staff are able to work in partnership with other agencies to safeguard children, including contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- 2.3.4. The Principal (and in her absence the Head and vice Principal) will ensure that all staff, temporary staff and volunteers are fully inducted, are made aware of the FAC Safeguarding and Child Protection policy and procedures (which includes children missing from education and whistle-blowing) and that staff are fully aware of their role in implementing these. All members of staff, temporary staff and volunteers need to read, sign and understand KCSIE September 2019 pt.1 and Annex A. All members of staff, temporary staff and volunteers must read, sign and understand the FAC Staff Safeguarding Code of Conduct, FAC Teaching and Learning policy, FAC Behaviours and Sanctions policy, FAC e-safety policy, and FAC Health and Safety policy. The records of training for these policies are maintained by the DSL. Tim Lyne maintains records for all health and safety training.
- 2.3.5. All members of staff, temporary staff and volunteers must undertake online training in Safeguarding, the Prevent Duty and GDPR.
- 2.3.6. All staff, temporary staff and volunteers are issued a card with the name and contact details of the DSL and DDSLs, the LADO and the MASH team.
- 2.3.7. All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and can make appropriate referrals to CSSW (Children's Safeguarding and Social Work)
- 2.3.8. The Principal, Head and Vice Principal have undertaken safer recruitment training. Safer recruitment practice is followed when recruiting to posts and the LADO is contacted immediately or within 24 hours by the Principal (and in her absence the Head) whenever an allegation is made against a member of staff, the DSL or volunteers.
- 2.3.9. Safeguarding issues are brought to the attention of the governing body.

## 2.4. Role of the designated safeguarding lead

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

The designated safeguarding lead (and their deputies) will:

- 2.4.1 liaise with and manage referrals to relevant agencies such as CSSW, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS);
- 2.4.2 take lead responsibility for safeguarding and child protection and keep the Principal, Head and SMT and board of governors informed of on-going safeguarding and child protection issues and enquiries
- 2.4.3 keep the Head and Principal and the board of governors informed of on- going safeguarding and child protection issues and enquiries;
- 2.4.4 to inform the Principal and Head immediately, the LADO immediately or within 24 hours and in serious cases the police if an allegation is made against a member of staff or volunteer.
- 2.4.5 to inform the nominated governor for safeguarding immediately in the event of an allegation against the Principal or Head
- 2.4.6 provide advice and guidance for staff on safeguarding and child protection issues and making referrals
- 2.4.7 ensure the college's safeguarding and child protection policies are up to date and consistent with Camden's Safeguarding Children Board policies and ISSRs and that policies are reviewed annually by the nominated governor for safeguarding, Principal, the Head, the Vice Principal and the Deputy DSLs.
- 2.4.8 ensure all staff, including temporary staff and volunteers are aware of and understand the policies and procedures and are able to implement them
- 2.4.9 attend regular training, i.e. every 2 years, including PREVENT awareness training and the designated teachers meetings hosted by CSF in order to keep up to date with new policy, emerging issues and local early help and local safeguarding and child protection procedures and working practices.
- 2.4.10 have an awareness of those children who may be in need, young carers and children who have special educational needs and in case of deputies liaise with SENDCO when considering any safeguarding action for a child with special needs. (DSL is also SENDCO).
- 2.4.11 liaise with the designated lead for LAC whenever there are safeguarding concerns relating to a looked after child or previously looked after child ( DSL is DL for LAC)
- 2.4.12 keep up with relevant safeguarding developments regularly, but at least annually.

- 2.4.13 oversee child protection systems within the college, including the management of records, standards of recording concerns and referral processes
- 2.4.14 have details of the looked after child's social worker and the name of the virtual school head in the authority that looks after the child. The DSL should also be trained to promote the educational achievement of looked after children.
- 2.4.15 provide a link between the college and other agencies, particularly CSSW and the Camden Safeguarding Children Partnership
- 2.4.16 act as PREVENT lead and refer any student at risk of being radicalized to the Camden PREVENT Education Officer and Police PREVENT Engagement Officer
- 2.4.17 ensure staff, including temporary staff and volunteers, receive appropriate safeguarding and child protection training every 2 years and are regularly updated at least annually.
- 2.4.18 ensure parents are fully aware of the college policies and procedures and that they are kept informed and involved.
- 2.4.19 ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools and colleges to enable continued support through the transfer.
- 2.4.20 Inform Camden within 5 days of admission of pupil registering at non-standard transition point.
- 2.4.21 Inform Camden if pupil misses 10 consecutive school days or more (unauthorised) or 20 consecutive days (authorised).
- 2.4.22 take responsibility for online safety of students and tutors

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

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

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

pupils need extra support.

- 2.5.6 For additional policies covering staff/pupil relationships and communications, and staff use of social media please see FAC [Staff Safeguarding Code of Conduct](#) and FAC Teaching and Learning policy.
- 2.5.7 Ask students for written consent to use their work or unidentified photographs of them on our website in our printed prospectus, in our printed newsletter/annual review or any other marketing material. Please see Appendix 3.

## **2.6 Multi-agency working**

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

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

## **3 Safeguarding children**

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

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

To achieve these aims, the college will:

- identify children in need who need extra help at an early stage and make appropriate referrals for an early help service to prevent concerns escalating
- identify children at the risk of harm who may be suffering from significant harm and make a child protection referral to CSSW and involve police if a crime has been committed.
- share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs.

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

### Safeguarding children - Camden Council

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. **Anybody can make a referral.**

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

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

### **3.1 Early help cases**

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

- children with disabilities and additional needs, including those with special educational needs (not necessarily on an Education Health Care plan)
  - 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, college or care;
  - children who are misusing drugs or alcohol;
  - children at risk of exploitation through modern slavery and trafficking;
  - children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse;
  - children who have returned home from care;
  - children who show early signs of abuse or neglect;
  - children at risk of radicalisation;
  - 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 college.
  - If the child requires an early help service from another agency, the college will make a referral to the Early Help service (via the Child and Family Contact team) for appropriate help and support. Staff will consult with parents prior to making any referral to discuss the matter and gain consent to refer the child.

- Where the child is receiving an Early Help service, the college will work as part of the Team around the Child and take up the role of lead professional where this is appropriate.
- Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the college believes that this is not the case, consideration should be given to making a referral for a statutory social work service.

### 3.2 Referral for a statutory social work service

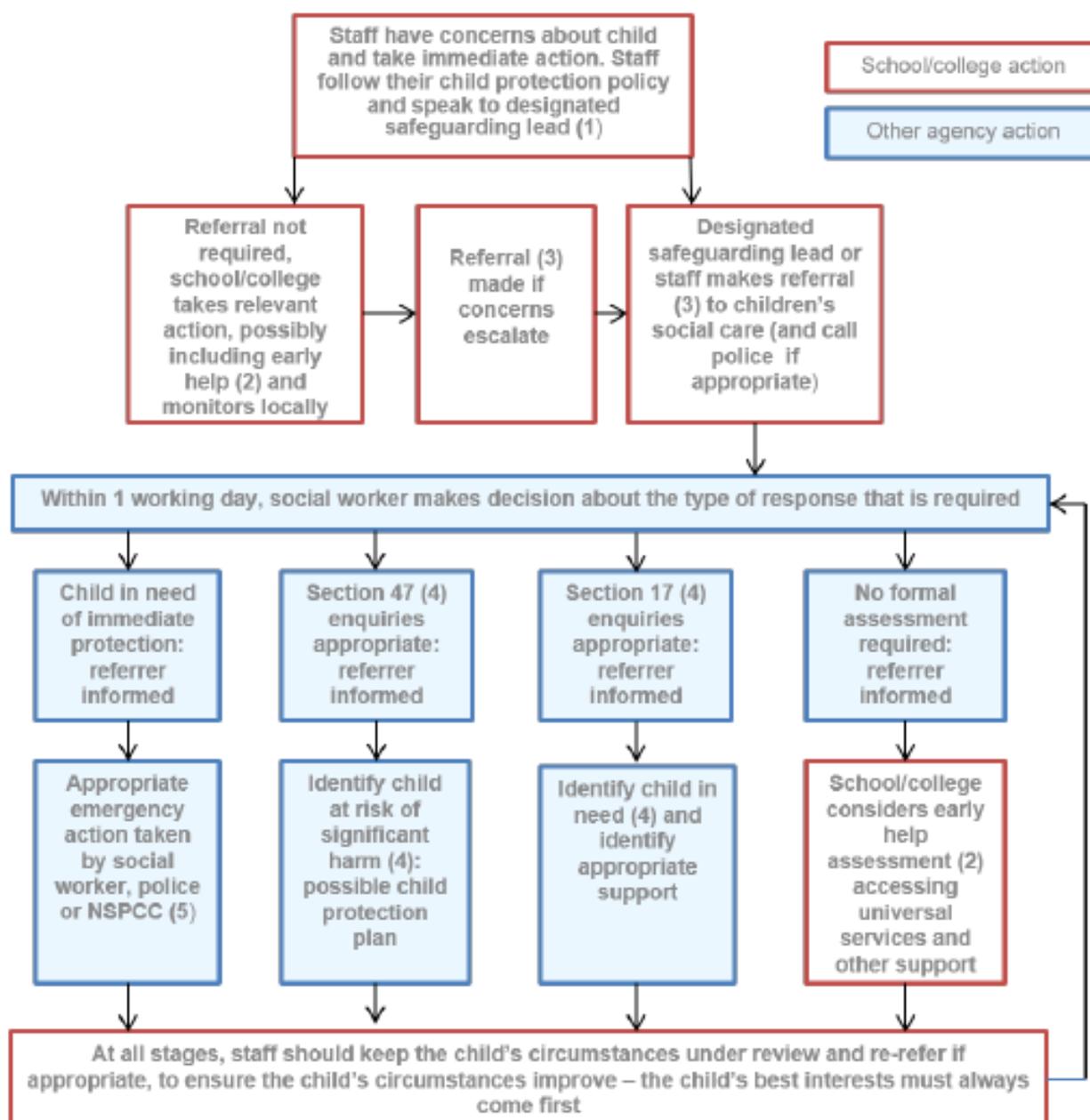
Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputies are most likely to have the most complete safeguarding overview. Following consultation the designated safeguarding lead should decide on whether to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

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

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

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

## Actions where there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the local authority's referral process. Chapter one of [Working together to safeguard children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of [Working together to safeguard children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## 4 Child protection procedures

### 4.1 Role of college

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

Keeping Children Safe in Education (DfE September 2019)

[Keeping Children safe in Education](#)

Working together to safeguard children (*DfE 2018*)

[Working together to safeguard children – Publications – GOV.UK](#)

What to do if you're worried a child is being abused (*DfE 2015*)

[What to do if you're worried a child is being abused - Publications - GOV.UK](#)

[The London Safeguarding Children Partnership child protection procedures](#) [London Safeguarding Children: Child Protection Procedures](#)

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

- identify those pupils where there are child protection concerns and making 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 college's role in implementing the child protection plan and continually monitoring the child's wellbeing, and liaising with the allocated social worker as required.

### 4.2 Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- Staff should refer to appendix 1 for a full definition of significant harm and the specific indicators that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where

required, advice on thresholds and indicators of harm can be obtained from the MASH social worker on a no-names basis.

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

### 4.3 Dealing with disclosures

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

- 4.3.1 listen to what is said without displaying shock or disbelief and accept what the child is saying;
- 4.3.2 listen and allow the child to talk freely;
- 4.3.3 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 the CSSW MASH team;
- 4.3.4 reassure the child that what has happened is not their fault and that they were right to tell someone;
- 4.3.5 listen and not ask direct questions but allow the child to tell their story;
- 4.3.6 not criticise the alleged perpetrator;
- 4.3.7 explain what will happen next and who has to be told;
- 4.3.8 make a formal record and pass this on to the designated teacher.

### 4.4 Referral

- 4.4.1 A decision on whether or not to refer a student to the MASH team should be made by the DSL or Deputy DSLs following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and any member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior management team and take advice from the Child and Family Contact team social worker. The designated safeguarding lead should be informed as soon as possible.
- 4.4.2 Referrals should be in writing using an e-CAF referral completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the e-CAF referral within 48 hours. **Anybody can make a referral.**
- 4.4.3 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 and Family Contact team social worker to

obtain advice on how to proceed.

- 4.4.4 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.
- 4.4.5 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.
- 4.4.6 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.
- 4.4.7 If the college does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with CSSW/Early help services via the designated safeguarding lead.

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

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

## **4.6 Monitoring**

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

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

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

## **4.7 Records**

4.7.1 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 college.

4.7.2 The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.

4.7.3 All information should be recorded on the safeguarding monitoring/incident form (see appendix 2) and all records should be signed and dated.

Records should show:

- what the concerns were;
- what action was taken to refer on concerns or manage risk within the college;
- whether any follow-up action was taken;
- how and why decisions were made.

4.7.4 any incidents, disclosures or signs of neglect or abuse are fully recorded with dates, times and locations. Records should also include a note of what action was taken.

4.7.5 the monitoring/incident form must be completed;

- whenever concerns arise or there is a serious incident or
- where a child is being monitored, prior to a case conference or core group meeting.

4.7.6 Where a child who is subject to a 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. These records must be sent separately from the academic records.

4.7.7 Child protection records will be kept indefinitely.

## **4.8 Confidentiality and information sharing**

4.8.1 All information obtained by college staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.

4.8.2 Young people aged over 13 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and over are able to give their own consent.

4.8.3 Where a child is at risk of suffering significant harm, the college has a legal duty to

share this information with CSSW and make appropriate referrals. Equally, where a child is subject to a child protection investigation, the college must share any information about the child requested by CSSW.

- 4.8.4 Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made and parents made aware of this. Before taking this step, the college should consider the proportionality of disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?
- 4.8.5 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, the college 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.
- 4.8.6 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.
- 4.8.7 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 college’s duty to share information.
- 4.8.8 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 Specific Safeguarding issues**

**Please read with regard to KCSIE 2019 annex A**

**All** staff should have an awareness of safeguarding issues. 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 CSSW or other agencies in order to overcome problems or keep them safe. The college is aware of the following policies so that they are able to respond to the needs of these vulnerable groups

## 5.1 Children who are missing from education or home educated

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

The college must enter pupils on the admission register at the beginning of the first day on which the college has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the college should undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.

The college must monitor pupils' attendance through their daily register. The college should inform local authorities of the details of pupils who fail to attend regularly, or have missed ten school days or more without permission. The college should monitor attendance closely and address poor or irregular attendance. It is important that pupils' poor attendance is referred to the local authority.

Where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register when the college and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the college does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause. The college refers to Camden's "Children missing from education" policy and the CSCP missing children protocol for further details available at: [Schools and Nurseries Safeguarding Policies | Camden Safeguarding Children Partnership](#)

Where a parent notifies the college 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 college has concerns about their welfare, the designated safeguarding lead should make a referral to CSSW.

## 5.2 Children who harm other children (peer on peer abuse)

Abuse is abuse and should never be tolerated or passed off as 'banter', 'just part of growing up' or 'having a laugh'. All peer on peer abuse is unacceptable and will be taken seriously. Where a pupil's behaviour is likely to cause significant harm to other pupils, for example through bullying, cyberbullying, upskirting (which is now a criminal offence), sexting, physical violence, initiation rites/hazing, physical abuse, sexual violence and sexual harassment, the college will refer the perpetrator and the victim to the Child and Family Contact team under the *Children who harm other children* protocol available at: [Policies / Guidance | Camden Safeguarding Children Partnership](#)

Abuse can take place wholly online or technology may be used to facilitate offline abuse.

The college does everything possible to encourage mutual respect and prevent peer on peer abuse. There is a robust educational programme delivered through PSHCE in the lower school and through weekly enrichment talks in the upper school. Through the system of personal tutorials there are also opportunities to address these issues.

Where the harm is attributable to sexually abusive behaviour or sexual harassment, the college will follow the CSCP Harmful sexual behaviour policy

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

### **Policy**

- The college recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. The college behaviour management and anti-bullying policies will reflect the college's approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- The college will follow the statutory guidance *Sexual violence and sexual harassment between pupils* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the college and appropriate referrals made to the police and CSSW. The college will refer the perpetrator and the victim to the Child and Family Contact team.
- The college will take all necessary steps to put in place a preventative programme via the PSHCE curriculum including Relationships and Sex education in order to convey the college's policy and promote respectful behaviour between pupils with regards to sexual conduct.
- The college will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the college and appropriate referrals made to the police and CSSW.
- The college will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff.
- The College ensures staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.
- The College is aware of our equality duty as victims of sexual violence and harassment are more likely to be female but follow the same procedures and the same level of response for incidents involving male pupils are incidents where victim and perpetrator are the same sex.

### **Procedures**

- The college will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the *Keeping children safe in education* statutory guidance.

- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the college environment.
- Where the allegation involves material posted online, the college will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance *Searching, screening and confiscation advice for schools*.
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the college will respond to the incident.
- Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out in the CSCP *Harmful sexual behaviour protocol*. The designated safeguarding lead may take advice from MASH social workers before making a decision. Possible outcomes include referral to Early Help Services, CSSW or the police, or managing the matter internally under college behaviour policies.
- Where a referral will be made to CSSW or the police under the protocol, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.
- The college will take any necessary action to continue to safeguard the victim and other pupils within the college environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and CSSW investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, the college will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf under the *Harmful sexual behaviour protocol*.

#### **Additional procedures**

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

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

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

recorded.

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

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

### 5.3 Prevention of radicalisation

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

**All staff** need to be aware of any pupils who may be in contact with or being targeted by violent extremists and refer them to the DSL.

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

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

[http://counterextremism.lgfl.org.uk/downloads/Prevent\\_Duty\\_Guidance\\_England\\_Wales.pdf](http://counterextremism.lgfl.org.uk/downloads/Prevent_Duty_Guidance_England_Wales.pdf)

The DSL will also seek 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 Education Officer (Jane Murphy [jane.murphy@camden.gov.uk](mailto:jane.murphy@camden.gov.uk) or call 020 7974 1008)

To make a referral to the Channel Panel the College should refer the student to the MASH team using an e-CAF in the same way as for other safeguarding referrals.

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

Please see FAC PSHE Scheme of Work for detailed delivery of British values and citizenship. All schemes of work also address these values and citizenship where apposite.

## 5.4 So-called ‘honour-based’ violence including Female Genital Mutilation and Forced Marriage

So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

## 5.5 Mandatory reporting of female genital mutilation (FGM)

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

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Where a pupil makes a disclosure of FGM, the 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.

## 5.6 Children at risk of forced marriage

*Forced marriage - Detailed guidance - GOV.UK*

A forced marriage is where one or both people do not (or in cases of people with learning disabilities or reduced capacity, cannot) consent to the marriage as they are pressurised, or abuse is used, to force them to do so. It is recognised in the UK as a form of domestic or child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will may be:

- physical – for example, threats, physical violence or sexual violence
- emotional and psychological – for example, making someone feel like they are bringing ‘shame’ on their family

Financial abuse, for example taking someone’s wages, may also be a factor.

The college will liaise with the Forced Marriage Unit (FMU) [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

## **Safeguarding vulnerable groups**

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

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

### **5.7. Looked after and previously looked after children and care leavers**

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

#### **Additional procedures**

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

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

*Many looked after young people in Camden who are aged 16 and 17 who remain looked after may be living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues..*

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

The college is aware that children with special education needs or disabilities may be more vulnerable to harm and abuse and may be more likely to experience bullying and peer on peer abuse. They may also have difficulty in reporting harm and abuse due to communications difficulties and professionals may miss vital indicators.

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

### **5.9 Domestic abuse and/or sexual violence**

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

*The college 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. The college should also be aware that the definition of domestic abuse now includes victims aged 16 and 17 years old and that these victims should be referred to Camden Safety Net for a service in their own right.*

### **5.10 Privately fostered children**

[https://cscp-new.co.uk/?page\\_id=8261](https://cscp-new.co.uk/?page_id=8261)

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

### **5.11 Young carers**

[https://cscp-new.co.uk/?page\\_id=8264](https://cscp-new.co.uk/?page_id=8264)

*If the college has 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)*

## **Contextual safeguarding for young people**

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

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

*The college is aware that many of these forms of exploitation are linked and that going missing from home or from education can be an indicator that young people are involved in child sexual exploitation, gang activity, modern slavery and trafficking.*

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

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

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

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

The College is aware of several indicators that could suggest that a student is at risk from or involved with gang based violence or serious violent crime. These include increased absences, a change in friendships or friendships with older individuals, a decline in performance or wellbeing, unexplained injuries or unexplained gifts/ new possessions.

*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.*

## **5.14 Modern slavery and trafficked children**

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

## **5.15 Children who run away/go missing**

Policies / Guidance | Camden Safeguarding Children Partnership

Safer recruitment

### **6.1. General principles**

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

The college will follow the *Keeping children safe in education* guidance (DfE September 2019). [Keeping children safe in education – Publications – GOV.UK](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

- 6.1.1 The college will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles, in accordance with statutory requirements. No staff member will be allowed to take up posts until all checks and enquiries required for that position have been satisfactorily completed.
- 6.1.2 Check with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school (see section 6.3)
- 6.1.3 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.
- 6.1.4 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. The college will take up the accredited safer recruitment training offered through the Camden Safeguarding Children Partnership or other accredited training provider.
- 6.1.5 Although the principal will have day-to-day responsibility for the recruitment of staff, the board of governors will ensure that they maintain an overview of recruitment systems

in order to scrutinise practice and ensure all statutory checks are carried out.

- 6.1.6 College 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. Records of phone calls made to check references or qualifications must be kept, including date and name of person spoken to.
- 6.1.7 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.
- 6.1.8 The Principal and Head will be responsible for keeping a single central record of all staff who regularly come into contact with students
- 6.1.9 The SCR should include details of all checks carried out and the outcome of these checks or any certificates obtained.
- 6.1.10 Where staff are recruited via third parties such as employment agencies, the Principal and Head 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
  - request written confirmation that an enhanced DBS certificate has been received by the agency
  - check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

## **6.2 Checks to be carried out**

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

- 6.2.1 The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided. This should be done when the applicant visits the College for interview.
- 6.2.2 The applicant's right to work in the UK must be evidenced through documentation. Only original documentation should be accepted and its validity checked in the presence of the applicant.
- 6.2.3 Where the applicant will be involved in regulated activity, an enhanced DBS check will be made, including information from the barred list. If the applicant will begin work before an enhanced DBS check can be completed, a barred list check will be obtained.
- 6.2.4 In the case of teaching staff, checks will be made on the applicant's academic and vocational qualifications and further checks made on TRA Teacher Services system and to ensure that they are not prohibited from teaching.

- 6.2.5 Checks will be made to ensure any member of staff or governor involved in the management of the school is not barred from doing so under a section 128 direction.
- 6.2.6 Where the applicant has been living abroad, similar enquiries will be made in the country of origin relating to the applicant's qualifications and suitability to teach via the TRA Teacher Services system.
- 6.2.7 If a candidate applying for a teaching post is not currently teaching, the college will contact their former college to enquire about their reasons for leaving.
- 6.2.8 Enquiries will be made regarding the applicant's state of physical and mental health to the extent that it may affect their capacity to carry out their role. A confidential medical questionnaire will be required to be filled in by the applicant.
- 6.2.9 The college will keep copies of the following documents on staff personnel files:
- documents used as proof of identity such as passports or driving licences
  - a summary of the DBS certificate (but all other documents relating to the DBS check must be destroyed)
  - documents that prove the staff member's right to work in the UK (failure to do so can result in a fine for employing illegal workers).
  - References from previous employers
  - Academic qualifications
  - Staff signatures from the FAC Staff Safeguarding Code of Conduct, the FAC e-safety policy, FAC Health and Safety policy, the FAC behaviour and sanctions policy, the FAC Teaching and Learning Policy, and Part 1 and annex A of Keeping Children Safe in Education (September 2019).
  - Confidential medical questionnaire
  - Evidence of online Child protection training.
  - Evidence of Prevent Duty online training.
  - Evidence of GDPR online training carried.

### **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 college as to the dates the applicant was employed and the reasons for leaving the post.
- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.

#### **6.4 DBS checks**

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

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

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle

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.

Enhanced DBS checks with barred list checks will also be carried out on permanent staff members working at the college.

A separate barred list check is obtained if the DBS certificate has not arrived when the applicant is due to start work. A risk assessment is then also required to be undertaken and supervised until the DBS certificate arrives.

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

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made

by the principal, and the following will be taken into consideration when deciding this:

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

The college has robust procedures for day to day staff management and supervision and clear procedures for reporting and acting on concerns. (see the FAC Teaching and learning policy, Staff Safeguarding Code of Conduct, FAC Behaviour and Sanctions policy and the Safeguarding and Child Protection Policy). Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

## **6.5 Governors and independent school management**

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

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

## **6.6 Alternative education provision**

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

# **7 Staff practice and conduct**

## **7.2 Induction and training**

- 7.2.1 The Principal, Head and Vice Principal will ensure that all staff, temporary staff and volunteers are fully inducted, are made aware of the FAC Safeguarding and Child Protection policy and procedures (which includes Children missing from education and whistle-blowing) and that staff are fully aware of their role in implementing these. All members of staff, temporary staff and volunteers need to read, sign and understand KCSIE 2019 pt.1 and Annex A. All members of staff, temporary staff and volunteers must read, sign and understand the FAC Staff Safeguarding Code of Conduct, FAC Teaching and Learning policy, FAC e-safety policy, and FAC Health and Safety policy. The records of training for these policies are maintained by the DSL. Records of Health and Safety training are maintained by Tim Lyne.

- 7.2.2 All new members of staff, temporary staff and volunteers must undertake online training in Safeguarding, the Prevent duty and GDPR.
- 7.2.3 All new staff, temporary staff and volunteers are issued a card with the name and contact details of the DSL, LADO, MASH and for whistleblowing.
- 7.2.4 The designated safeguarding lead will ensure that all staff, temporary staff and volunteers are fully inducted with regard to the college child protection procedures and that they receive safeguarding and child protection training on a two yearly basis and are regularly updated, at least annually, in any developments in child protection and safeguarding.
- 7.2.5 The Principal, Head and Vice Principal will keep a central record of all statutory and other training undertaken by staff members and governors.
- 7.2.6 College staff will receive multi-agency safeguarding training provided by Camden Safeguarding Children Partnership at the relevant level.
- 7.2.7 As well as basic safeguarding training, the designated safeguarding lead and their deputies will receive specific training on their role at least every two years and other relevant multi- agency training courses provided by Camden SCP. They will also remain apprised of any changes in safeguarding and child protection issues.
- 7.2.8 College staff will also receive training on the use of the Common Assessment Framework assessment and referral process as part of their safeguarding training.

### **7.3 Conduct and safe teaching practice**

- 7.3.1 The college expects staff 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.
- 7.3.2 All new members of staff must sign the FAC Staff Safeguarding Code of Conduct that sets out the college expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- 7.3.3 Staff 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 .pdf>
- 7.3.4 Staff will be expected to follow FAC e-Safety policy and FAC Teaching and Learning policy protocols 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 college computer system.

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

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

It is the college's policy to use physical intervention and restraint only in line with Camden CSF policy [“Physical intervention policy for schools and centres”](#) *DfE's document “Use of Reasonable Force (July 2013)”*, please see FAC [‘Behaviour & Sanctions Policy 2018](#).

There is a FAC Behaviour & Sanctions Book for the recording of major incidents, including physical searches, restraint, searches and confiscations etc.

Physical intervention and restraint on pupils should only be used as a last resort, normally when de-escalation strategies have failed, and when there is a clear risk of serious harm to the pupil or others or serious damage to property.

Decisions on when to use physical intervention is a matter of professional judgement, and any intervention or restraint should be proportionate, reasonable and necessary to the perceived risk and should continue only for as long as the risk remains. Should such an intervention be required the school should record the details, including any injury, and contact the parent/carer on the same day to explain the circumstances involved

## **7.5 Individual tuition**

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

Tutors teaching one to one:

- Need to alert SMT
- Keep the classroom door open at all times
- Music tutors need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:
  - ensure they behave in an appropriate manner and maintain professional boundaries at all times
  - only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed
  - make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why
  - ask the child's permission first and respect their wishes
  - report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken.
- Keep CCTV on

## **7.6 Allegations against staff including the DSL and volunteers**

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

The Principal will be the college representative for the purposes of the allegations procedures and will contact the Local Authority Designated Officer for all allegations raised, immediately or within one working day.

The Head will act in her absence. The LADO will consider the nature, content and context of the allegation and agree a course of action in order not to jeopardise statutory investigations. The College will not investigate prior to consultation with the LADO. The College will record any such discussions in writing.

In borderline cases, discussions with the LADO can be held informally and without naming the college or individual.

All allegations in relation to staff members including the DSL will be referred to the Principal, and in her absence the Head; allegations against the principal and/or Head will be referred to the nominated Governor for safeguarding. The College will maintain confidentiality and guard against unwanted publicity up to the point where the accused is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

Where a staff member is removed or resigns or is deployed to another area of work that is not regulated activity from the college prior to or following the upholding of an allegation against that person and the Principal/Head and the LADO agree that the person is unsuitable to work with children, the Principal/Head will refer the individual promptly to the DBS and the TRA.

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](#)

## **7.7 Whistleblowing**

The college fosters a culture of openness in line with the 'Freedom to speak up' review and has 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 college that may cause a risk to children.

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

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

7.7.1 Camden's lead officers for child protection or safeguarding where there are issues

regarding the welfare of a pupil;

7.7.2 Camden Council's confidential and independent help-line for protected disclosure on **0800 374199** where there are issues around the college's overall procedures around safeguarding or phone the NSPCC helpline on 0800 028 0285 available Monday to Friday 8:00AM to 8:00 PM or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

7.7.3 The Principal,(and in her absence, the Head and Vice Principal) are responsible for ensuring that the number for Camden Council's help-line is advertised on the college premises and made available to staff and pupils.

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

## **8 Health and safety and risk assessments**

### **8.2 Responsibility for health and safety**

The Principal (and in her absence the Head and Vice Principal) 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 college environment. Please see FAC Health and Safety Policy 2019.

The health and safety policy adapted by the college is based on the government guidance and seeks to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves. Day-to-day responsibility for health and safety issues in the college will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training. This is:

Name: Tim Lyne

Designation: Health and Safety Administrator (HSA)

Contact: 0207 586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

Name: Leanne Slavin

Designation: Deputy Health and Safety Administrator

Contact: 0207 586 0312 [mail@hampsteadfinearts.com](mailto:mail@hampsteadfinearts.com)

### **8.3 Risk assessments**

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

- on an annual basis for the college environment as a whole
- for all college trips
- for pupils travelling between locations during the college day
- for all work-based learning or work experience placements
- when a pupil who has been excluded for risky or violent behaviour is returning to the college
- whenever there are any changes to the college environment or college practices
- following any serious incident.

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

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

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

#### **8.5 Site security and visitors**

- 8.5.1 The Board of Governors is responsible for the security of the college premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- 8.5.2 The principal( and in her absence the head) 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. This decision is informed by a risk assessment.
- 8.5.3 Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the principal will request written confirmation that relevant checks have been carried out for that individual.
- 8.5.4 All visitors and contractors will be:
  - informed to report to reception on arrival;
  - expected to provide proof of identity
  - expected to wear a name-badge or carry some form of identification at all times when on the college premises;

- suitably supervised by college staff at all times;
  - made aware of college health and safety procedures.
- 8.5.5 The principal and board of governors will ensure that any contract entered into with contractors sets out clearly the expectations for workers' behaviour and the responsibility of contractors to monitor and ensure compliance with college policies.
- 8.5.6 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.
- 8.5.7 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 subject tutors in advance what level of supervision or contact they will have regarding pupils.

## **8.6 Monitoring and review**

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

- 8.6.1 all college policies are regularly monitored by the designated safeguarding lead and annually reviewed by the board of governors and principal.
- 8.6.2 the college keeps a central record of all accidents and incidents including what action was taken and by whom;
- 8.6.3 staff are aware of their responsibility to record accidents and incidents;
- 8.6.4 the Principal and Head have an overview of all accidents/incidents;
- 8.6.5 serious accidents and incidents are reported to the board of governors
- 8.6.6 the designated safeguarding lead ensures a high standard of recording of all concerns held about children;
- 8.6.7 all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around college safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

### **Appendix 1:**

#### **CHILD PROTECTION; DEFINITIONS AND INDICATORS**

##### **Definitions**

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

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

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

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

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

**Possible indicators of abuse and neglect**

<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:  
Safeguarding children monitoring/incident form**

**Name of school:**

**Name of child:**

**DOB:**

**Status:**  monitoring due to concerns       subject to child protection plan

**Concerns/risks**

Attendance and punctuality

Periods of exclusion (including dates)

Contact with parents/family

Health and physical appearance

Behaviour and emotional presentation (including any sexualised behaviour)

Concerning incidents

Peer relationships

Academic performance and achievement

**Views of child and parents**

**Outcomes of monitoring**

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

**Action taken**

Name of staff member:

Date

**Appendix 3: Student Permission**

**Data Protection**

We need to ask you for specific permission for the following. Could you please indicate your agreement and sign below to indicate whether you give, or withhold, your permission.

**Photographs of students**

We use unidentified photographs of students on our website, on our Instagram account, in our printed prospectus, and in our printed newsletter/annual review to illustrate articles about the College, our educational trips or events that take place here. Individual student names will *not* be used unless we have contacted you personally to ask for additional permission for this.

**Publishing photographs of students' work**

We sometimes publish photographs of students' work on our website, on our Instagram account, in our newsletter/annual review, in our printed prospectus or on other websites/social media

- 1. I **do** agree to photographs of myself or my work being used by the College for the purposes described above

Signed.....Date.....

Name (please print).....

- 2. I **do not** agree to photographs of myself or my work being used by the College for the purposes described above

Signed.....Date.....

Name (please print).....