Guildhouse School
43-45 Bloomsbury Square, London, WC1A 2RA
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www.guildhouseschool.com

Safeguarding and Child Protection Policy

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Approved by Head:	Sept 2026
Approved by Governing Body:	20/10/2026
Lead for Review:	Deputy Headteacher Pastoral & Boarding
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1 Key Contacts

School

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London Borough of Camden

Lead Child Protection Practitioners

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Part A: Core operational policies and procedures

2 Purpose of policy

This policy sets out how the 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. The governing body will ensure that this policy is appropriate so as to safeguard and promote student welfare. The school will ensure that safeguarding systems are clear, well promoted, easily understood and accessible, enabling students to report concerns confidently and ensuring prompt, appropriate responses.

The school is committed to the safeguarding of its students and takes a holistic approach to safeguarding – student safety and welfare will be the key focus when developing policies so that the school environment and culture is one where:

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

As a boarding school, Guildhouse London complies with the National Minimum Standards for Boarding Schools and ensures safeguarding arrangements are fully integrated across education and boarding provision. The school recognises that safeguarding responsibilities extend beyond the school day and apply to all boarding, educational, enrichment and off-site provision.

3 Roles and responsibilities

3.1 Camden Council

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

- co-ordinating the delivery of integrated children's services within the borough, including a targeted 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 online safety

- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are missing from or not in education, including children who are known to be home educated.

3.2 Governing body

The governing body will ensure that the school meets its statutory duties with regard to safeguarding and protecting students and that processes are in place to enable staff to understand the nature of safeguarding children in education and their role and responsibilities in doing so.

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

In particular, the governing body will ensure the following:

- The school has the following policies in place and that these are regularly monitored, reviewed annually and updated where necessary:
    - safeguarding and child protection policies and procedures that are consistent with Camden Safeguarding Children Partnership and Camden's internal policies, early help, online safety, extra-familial harm and child on child abuse
    - a staff code of conduct policy that covers staff/student relationships, dealing with low level concerns and allegations, whistleblowing, communications and staff use of social media
    - a student behaviour policy that includes measures to prevent bullying and harassment, including cyberbullying, prejudice based and discriminatory bullying
    - a procedure for responding to incidents where children go missing or are absent from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school 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.
- There is a nominated safeguarding link governor with responsibility for liaising with Camden on safeguarding and child protection matters and who links with the LADO in the event of an allegation against the headteacher. She is trained to the same level as the DSL.
- A senior member of staff (Jamie Forbes) is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy. Jamie Forbes is given sufficient time and resources to carry out his responsibilities as are other members of staff appointed to deputise in his absence.
- Staff know that any allegation or concern against the DSL should be discussed with the headteacher.

- Staff know that any allegation or low-level concern regarding a member of staff should be discussed with the headteacher.
- There is a designated teacher (Jamie Forbes) nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.
- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and students are aware of the school's safeguarding and child protection policies and procedures.
- Governors take steps to ensure students 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 safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least 1 member of the governing body has undertaken accredited safer recruitment training.
- The school will carry out appropriate checks on volunteers in accordance with KCSIE 2026. Decisions regarding DBS and barred list checks will be based on a written risk assessment, taking account of the nature and frequency of contact with children and whether the volunteer is engaged in regulated activity.
- The Central Team will maintain and provide a Single Central Record in accordance with statutory requirements and will ensure all required safer recruitment checks are completed and recorded.
- Where staff have lived or worked overseas, the school will undertake such additional checks as it considers appropriate to establish suitability to work with children, alongside all other required recruitment checks.
- All staff receive annual safeguarding and child protection training and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation.
- All governors and trustees will undertake safeguarding and child protection training that will equip them to provide strategic challenge and assurance that safeguarding policies, procedures and practice are effective.
- The school has procedures in place to deal with allegations made against other students.

- 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 students.
- The school uses Securly to monitor student online activity and ensure safe digital environments. Monitoring reports are reviewed by the DSL and shared with the governing body to support safeguarding oversight.
- The governing body reviews the Safeguarding Policy whilst giving members of staff with safeguarding experience responsibility for writing the policy.
- The Safeguarding Policy is reviewed annually and updated whenever needed in response to safeguarding issues as they emerge and evolve, including lessons learnt and changes in legislation. Reviews are conducted by the DSL, approved by the headteacher and ratified by the governing body.

3.3 Schools and senior leadership team

The headteacher and senior leadership team will ensure that the school meets its statutory safeguarding duty by ensuring the following:

- All staff are aware of their role and responsibilities for safeguarding under Part 1 of the guidance Keeping children safe in education (2026) Keeping children safe in education 2026 This includes the headteacher, who joins staff in having regular child protection training.
- Staff are inducted thoroughly in line with the Safer recruitment Policy and staff code of conduct.
- There is a face-to-face induction led by the DSL or a deputy as well as online training modules to complete (Level 2 Safeguarding and Prevent). It is made explicitly clear as to who the Safeguarding Team is. Staff must confirm they have read, received and understood the Safeguarding Policy, KCSIE, and all other associated policies:
    - KCSIE 2026 Part 1
    - Safeguarding and Child Protection Policy and Procedures
    - Student Behaviour Policy
    - Staff Code of Conduct (appendix 4)
    - Children Absent from Education, Missing Student & Supervision Policy
    - Online Safety Policy
    - Whistle-blowing Policy
    - Mental Health Policy
    - The role of the DSL and the Safeguarding Team – who they are and how to contact

All staff are given face-to-face annual update training in line with KCSIE to ensure every member of staff and every governor:

- Know the name of the Designated Safeguarding Lead/Deputies and their role.
- Know how to identify the signs of abuse, neglect and exploitation, understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.
- Are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful.
- Know how to pass on and record concerns about a student.
- Understand they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation and for referring safeguarding concerns to the DSL/DDSL.
- Understand what is meant by, and the importance of, showing professional curiosity.
- Understand that they have a responsibility to provide a safe environment in which children can learn.

- Are aware that some groups are potentially more at risk; evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- Understand their role in the early help/target support process.
- Understand the role of filtering and monitoring and process for reporting issues.
- Staff are also emailed a copy of the updated guidance and must confirm that they have read, received and understood it – this is confirmed through MS Forms.
- The DSL/Leadership team ensure all staff receive appropriate ongoing safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities.
- The training should be regularly updated, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- Additional safeguarding training is also organised for teachers and academic support staff. In addition, safeguarding related agenda items as part of pastoral meetings feature across the academic year (including online safety and prevent).
- All staff are able to identify those children who need extra help and can make appropriate referrals for a targeted early help service.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are safeguarding, and child protection concerns and can make appropriate referrals to CSFH.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the

child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social care practitioners.

- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The school offers a safe environment for staff and students to learn.
- Safeguarding issues are brought to the attention of the governing body.

3.4 Role of the designated safeguarding lead

The role of the designated safeguarding lead and their deputies 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. At least one member of the Safeguarding Team is always available onsite during school hours. The school uses MS Teams to communicate, and staff can message or call a member of the team if required (as can students).

The designated safeguarding lead will be a senior member of the leadership team with the appropriate status, authority and resources to carry out the role effectively. The designated safeguarding lead will be given sufficient time, funding, training, support and administrative resources to fulfil their safeguarding responsibilities and will have direct access to senior leadership decision-making.

The Safeguarding Team comprises the DSL, Deputy DSLs and staff who have completed safeguarding training appropriate to designated safeguarding lead responsibilities. The DSL, Deputy DSLs and relevant members of the Senior Leadership Team receive safeguarding training that meets the requirements for designated safeguarding leads and is refreshed at least every two years.

The school ensures that a suitably trained DSL, Deputy DSL, or Level 3 safeguarding trained member of the Senior Leadership Team is available to provide safeguarding advice and support whenever students are under the school's care, including during evenings, weekends, educational visits and holiday periods where boarding or accommodation provision remains operational.

During the school day, at least one member of the Safeguarding Team is available onsite. Outside normal school hours, safeguarding cover is provided through the DSL, Deputy DSLs and trained members of the Senior Leadership Team. Staff are informed of current safeguarding duty arrangements and relevant contact details through induction, safeguarding training and established communication channels.

Where the DSL is absent due to leave, illness, training or other commitments, a Deputy DSL will assume safeguarding responsibilities and have full access to safeguarding records and systems. In exceptional circumstances where neither the DSL nor a Deputy DSL is immediately available, staff must not delay taking action to safeguard a child and should contact children's social care, the police or emergency services as appropriate, informing the DSL or Deputy DSL at the earliest opportunity.

The DSL, Deputy DSLs and relevant members of the Senior Leadership Team are trained to the Level 3 DSL standard in accordance with local requirements and renew their training every two years. Training records are maintained centrally on SharePoint. Members of the Safeguarding Team also undertake additional safeguarding training and regularly meet to discuss updates, review cases,

identify learning and reflect on safeguarding practice. The DSL and Deputy DSLs meet regularly to review cases, support professional wellbeing and ensure consistency of safeguarding decision-making. The school recognises the importance of safeguarding supervision to support effective decision-making, professional challenge and staff wellbeing. External safeguarding supervision may be sought for complex, high-risk or emotionally demanding cases. The designated safeguarding lead (and the deputies) will:

- liaise with and manage referrals to relevant agencies such as CSFH, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS) including keeping records of decisions made and the rationale for them;
- keep the headteacher, senior leadership team and the board of governors informed of on-going safeguarding and child protection issues and enquiries;
- provide advice and guidance for staff on safeguarding and child protection issues and making referrals and support them through the referral process;
- ensure the school's safeguarding and child protection policies are up to date and consistent with Camden's Safeguarding Children Partnership policies and that policies are reviewed annually;
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them through robust induction processes;
- attend regular training, including Prevent awareness training, and the designated teachers meetings hosted by Camden in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices;
- provide regular updates received from Camden to all staff members and governors on any changes in safeguarding or child protection legislation (updated information will be provided by Camden at the designated teachers meeting and safeguarding trainers via 6 weekly bulletins; designated safeguarding leads will be responsible for communicating this information to staff immediately; they may decide to hold workshops or discuss in staff meetings);
- have an awareness of those children who may be more vulnerable to poor educational outcomes due to safeguarding and other issues such as children in need, children with child protection plans, children with mental health issues, young carers and children who have special educational needs;
- liaise with the person responsible for access arrangements when considering any safeguarding action for a child with special needs;
- liaise with the school's mental health lead (DSL) or CAMHS team as appropriate where safeguarding concerns are linked to mental health issues;
- raise awareness with staff on how children's vulnerabilities and exposure to safeguarding issues such as neglect, abuse and trauma can negatively influence their educational attainment and behaviour and how staff can work to meet these challenges and improve outcomes;

- liaise with the Camden Virtual School Head in order to meet the educational needs of children known to CSFH;
- liaise with the designated teacher for LAC (DSL) 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, ensuring confidentiality, standards of recording, and referral processes;
- provide a link between the school and other agencies, particularly CSFH and the Camden Safeguarding Children Partnership;
- ensure staff, including temporary staff, receive safeguarding and child protection training at induction and at least annually thereafter, together with regular safeguarding updates , including online safety training, identifying the early signs of child-on-child abuse and sexual violence and sexual harassment;
- the DSL is responsible for maintaining accurate training records;
- ensure parents are fully aware of the school policies and procedures and that they are kept informed and involved;
- encourage a culture where children are listened to, their views taken into account and where they are encouraged to participate in keeping themselves safe;
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support for the child on transfer.
- Ensure the effectiveness of filtering and monitoring systems is regularly reviewed. The DSL will work closely with the Head of Central IT and other relevant staff to ensure filtering and monitoring arrangements remain effective, proportionate and appropriate to the safeguarding risks within the school.
- The DSL will review relevant filtering and monitoring reports and alerts and ensure safeguarding concerns arising from online activity are acted upon appropriately.

3.5 Working with parents and carers

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

The school will:

- make parents aware of the school statutory role in safeguarding and promoting the welfare of students, including the duty to refer students on where necessary, by making all school policies available on the school website or on request;
- provide opportunities for parents and carers to discuss any problems with personal tutors 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 students need extra support.

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

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

3.6 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* 2026.

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

Governors, school managers and the senior leadership team will ensure these safeguarding arrangements are followed and that the school is able to raise any safeguarding issues and emerging trends with the CSCP via the CSCP Headteacher members and/or the Camden Learning representative.

Full details of the arrangements can be found at: Camden Safeguarding Children Partnership — CSCP — New Safeguarding Arrangements

3.7 Contacting the police

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

https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf

3.8 Operation Encompass

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

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

Brief

Operation Encompass is a national initiative that helps to safeguard children and young people who may have been exposed to domestic abuse. In practice, this means that if the police are called to a domestic abuse incident and a child has been present when this happened, then the police will notify the child's school's designated safeguarding lead. This will be done as early as possible in the

morning and allow the school to silently support the child. This allows for rapid provision of support within the school environment and means that children are better safeguarded against the effects of domestic abuse.

The school should share details of the notification with as few staff members as possible in order to keep the information confidential, and the school will need to decide on the most appropriate staff member to be informed; this may be the Personal Tutor, Pastoral Director/Head of Year or pastoral support staff.

4 Safeguarding students

4.1 Safeguarding Duty

The school will carry out its duty to safeguard students which is:

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

The school recognises that safeguarding is everyone's responsibility and seeks to create a culture of vigilance where staff maintain an attitude that 'it could happen here'. Staff are expected to act immediately on any concern, however small, and to prioritise the best interests of the child at all times.

4.2 Family Help Service

Camden's Family Help service provides social care services for children who would benefit from extra support including:

- children with disabilities, and has certain medical conditions and additional needs, including those with special educational needs
- children with mental health needs
- young carers
- young people who are pregnant or are a parent
- children exhibiting early signs of abusive or violent or harmful behaviours
- children showing early signs of being drawn into or affected by anti-social or criminal behaviour, including gangs, organised crime or county lines
- children who frequently go missing from home, school or care;

- children who have experienced frequent removals from the classroom, multiple suspensions, on a part-time timetable or is at risk of being permanently excluded from schools, colleges and in alternative provision or a Pupil Referral Uni
- children who are misusing drugs or alcohol
- children at risk of exploitation through modern slavery and trafficking, and criminal or sexual exploitation
- children whose home circumstances presents a challenge, such as adult substance use or mental ill health or domestic abuse
- children at risk of radicalisation
- children who have a parent in prison or who are affected by parental offending
- children at risk of honour or faith-based abuse including FGM
- privately fostered children

4.2 Referral for Family Help Services

The school will refer to the London Safeguarding Children thresholds and eligibility criteria https://londonsafeguardingchildrenprocedures.co.uk/chapter/threshold-document-continuum-of-help-and-support to help make decisions on the child's level of need. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for a Family Help service.

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

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

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

Schools have a legal duty to share information to safeguard and promote the welfare of a child under the Children Act 2004. Parental consent is not required for a referral to be made but parents will be informed that a referral is being made unless this may put the child at risk of further harm, interfere with a criminal investigation or cause undue delay.

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

- Carrying out a Family Help assessment to identify the child's needs and establish if the child is a child in need under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a strategy meeting under child protection procedures as set out in section 5 for any child where there are concerns about significant harm and/or taking any immediate action to protect the child.
- Providing services for the child and their family in the meantime whilst work is on-going (including details of services).

The school aims to create a culture of listening to students through:

- A culture of raising issues/concerns through the pastoral system
- The Student Council
- Awareness of safeguarding leads and who they can talk to
- An Independent Person
- A Personal Development programme, inclusive of PSHE and RSE, which raises awareness of safeguarding (including online safety) and creates a safe space for discussion

5 Child protection procedures

5.1 Role of school

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

- Working together to safeguard children (DfE 2026)

  Working together to safeguard children (DfE 2026)
- 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 Board child protection procedures

  https://www.londonsafeguardingchildrenprocedures.co.uk/
- Keeping children safe in education (DFE 2026)

  Keeping children safe in education (2026)

- Prevent Duty Guidance: for England and Wales (2023)

  Prevent duty guidance - GOV.UK (www.gov.uk)

- Relationships Education, Relationships and Sex Education (RSE) and Health Education (September 2026)

  Relationships Education, Relationships and Sex Education and Health Education guidance

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

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

5.2 Recognition

- Staff have a responsibility to identify those children who are suffering from abuse neglect or exploitation and to ensure that any concerns about the welfare of a student are reported to the designated safeguarding lead.
- Staff should refer to the London safeguarding children procedures for full definitions of abuse, harm and neglect.
  https://www.londonsafeguardingchildrenprocedures.co.uk/responding_concerns.html
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or one of the deputies 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.
- The school recognises that certain groups of students may be particularly vulnerable and require tailored safeguarding measures. These include:
- Boarders, who live on site and may be at increased risk due to extended contact with staff and peers outside of regular school hours. Safeguarding arrangements for boarders include clear reporting pathways, supervision protocols, and staff training specific to residential settings.
- Students residing in independent accommodation remain within the scope of the school's safeguarding responsibilities. The school will ensure appropriate oversight, welfare monitoring and accommodation approval arrangements proportionate to the student's age, vulnerability and circumstances
- The school recognises that international students may face additional safeguarding vulnerabilities including language barriers, visa delays, dependence on educational agents or guardians, uncertainty regarding immigration status, cultural adjustment,

accommodation concerns and separation from family support networks. These factors will be considered when assessing and managing safeguarding risk.

- The school provides targeted pastoral support, an induction programme and maintains regular communication with families, educational agents and guardians.
- The school recognises that some students may arrive in the UK before guardianship, accommodation or immigration arrangements are fully established. Such circumstances will be assessed on a case-by-case basis and may require safeguarding oversight until appropriate arrangements are confirmed.
- Students aged 18 and over, who, while legally adults, remain within the scope of the school's safeguarding responsibilities. Staff are trained to recognise and respond to the needs of over-18s to ensure that any specific risks associated with this group are appropriately assessed and managed.
- Where relevant, additional risk assessments such as those for education trips or overseas travel are used to identify and mitigate risks associated with specific activities or contexts.
- Staff will be vigilant to specific times in the school day (for example after school) when safeguarding risks, including extra-familial harm, serious youth violence and child on child abuse, is more likely to occur, and the school will take appropriate action to reduce this harm.

Whilst safeguarding legislation and statutory child protection procedures principally apply to children under the age of 18, the school recognises that many students remain vulnerable beyond their eighteenth birthday. Where students are aged 18 or over, the school will continue to apply safeguarding principles, respond to welfare concerns, share information where appropriate and refer concerns under adult safeguarding, Prevent, criminal justice, mental health or other relevant procedures as necessary, whilst continuing to provide appropriate pastoral support.

The school recognises the importance of intersectionality in safeguarding practice. Vulnerabilities do not exist in isolation, and students may experience multiple, co-occurring factors that increase their risk. For example, a student may be both an international boarder and have special educational needs or be over 18 and experiencing mental health difficulties. Staff are trained to consider the combined impact of these factors when assessing risk and providing support. Safeguarding responses are tailored to reflect the complexity of each student's circumstances, ensuring that no single vulnerability is overlooked.

5.3 Dealing with disclosures

Staff should bear in mind that children may not find it easy to disclose abuse and may need time before they feel ready to do so; in some cases, for example child exploitation, they may not recognise that what they are experiencing is abusive. Disclosure is more likely where there is a trusting relationship with the staff member and the student feels safe to share information.

It is important that where staff have reason to believe a student is at risk of harm but there is no disclosure, they persevere, giving the student time and space to disclose when they feel comfortable to do so. Any concerns should be shared with the designated safeguarding lead so that advice and

support can be offered on how to support the student to engage. Consideration should also be given to addressing any communications difficulties that may be a barrier to disclosure.

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

- listen to what is said without displaying shock or disbelief and accept what the child is saying;
- allow the child to talk freely;
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to CSFH;
- reassure the child that what has happened is not their fault and that they were right to tell someone;
- 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 as soon as possible. This can be done via email and should include: the students name, date/time of disclosure, location of disclosure, the student's account (when, where, who, what, how).

5.4 Referral

- Where possible, a decision on whether or not to refer a student to CSFH should be made by the designated safeguarding lead or a deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and any member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior leadership team and take advice from the Children and Families Contact team social worker. The designated safeguarding lead should be informed as soon as possible.
- Referrals should be in writing using an e-CAF referral completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the e-CAF referral within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a "no names" basis with the Contact team social worker to obtain advice on how to proceed.
- Parental consent should be sought prior to the referral being made but a referral can be made if parents refuse consent where there are safeguarding concerns about the child and referral is a proportionate response to these concerns. Consent should not be sought if this would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay.

- If the student already has an allocated Family Help practitioner, the referral should be made directly to them. If the child is not already known to CSFH, referrals should be made to the Contact team. If the child lives outside Camden, a referral should be made to their home local authority.
- All referrals will be acknowledged by the Children and Families 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 CSFH/Early help services via the designated safeguarding lead.

5.5 Attendance at case conferences and core groups

- The designated safeguarding lead will liaise with CSFH to ensure that all relevant information held by the school is provided to CSFH 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:
    - where possible, a member of staff who knows the child best, such as a class teacher, personal tutor or pastoral director (Head of Year) will be nominated to attend
    - failing that, the designated safeguarding lead or a deputy will attend
    - if no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

5.6 Monitoring

Where a student 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 child protection log shown at appendix 2 prior to each conference and core group meeting;
- the completed monitoring form will be kept on the student'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.

5.7 Records

- The school is committed to maintaining accurate, timely, secure and confidential safeguarding records.

- All concerns, disclosures, observations, referrals, actions and decisions relating to the welfare and protection of children will be recorded and managed in accordance with statutory guidance and data protection requirements. Safeguarding records will include the actions taken, decisions reached and the rationale for those decisions
- Child protection records relating to students are highly confidential and will be kept in a designated welfare file separate to the student's education records. These records will be securely held with restricted access and therefore secure. Any student that has a safeguarding concern associated with them will have a separate case folder.
- All staff have a responsibility to act immediately if they have a concern about a student's welfare, safety or wellbeing. Concerns should be reported to the Designated Safeguarding Lead (DSL) or a Deputy Designated Safeguarding Lead (DDSL) as soon as possible and on the same day.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- Staff are expected to provide a written account of safeguarding concerns by email via the school's approved safeguarding reporting process, including:

  -Date and time of the concern.

  -Student's name.

  -Date and time of any disclosure or incident.

  -Location of the incident or disclosure.

  -Factual observations.

  -The student's own words where possible.

  -Names of witnesses, where applicable.

  -Actions already taken.

  -Name of reporting member of staff.
- Staff should distinguish clearly between fact, observation and professional opinion.
- Records should be objective, accurate and completed as soon as possible after the concern arises.
- 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.
- The log must be completed;
    - whenever concerns arise or there is a serious incident or
    - where a child is being monitored, prior to a case conference or core group meeting.
- Child protection files must be accessed, and information shared by members of staff on a "need to know" basis only.
- Where a child who is subject to a child protection plan transfers to another school, the designated safeguarding lead is responsible for ensuring that copies of all relevant records are passed to the designated safeguarding lead at the new school within 5 days. This will be done by email and password protected attached files after having confirmed that the student has transferred to the new school. Confirmation of receipt of will be requested.
- Where a child transfers to another school or college, the DSL will ensure that relevant safeguarding records are transferred securely and separately from the main pupil file as soon as possible and within five working days of confirmation of the transfer. Receipt of the records will be obtained and retained. Where appropriate, the DSL will also speak directly with the receiving DSL to ensure continuity of support and discuss any ongoing safeguarding concerns or risk factors.
- Schools should also consider whether to share information that would be relevant for the new school to carry out an assessment of risk for the student and others in the school, for example incidents or concerns around serious violence or harmful behaviour. The designated safeguarding lead should discuss concerns with the new school via a telephone call.

Safeguarding and child protection records will be retained in accordance with statutory requirements, the school's Data Retention Policy and applicable data protection legislation. Child protection records will normally be retained until the student's 25th birthday, or for such period as required by law, regulation or legal proceedings.

Use of iSAMS Wellbeing Module

The iSAMS Wellbeing Module serves as the school's primary safeguarding recording system. Where additional confidential documentation is required, this will be securely maintained by the DSL and cross-referenced within iSAMS. The DSL/DDSL will ensure:

- Accurate recording of concerns.
- Maintenance of safeguarding chronologies.
- Recording of actions and outcomes.
- Recording of referrals and external agency involvement.
- Secure storage of safeguarding information.
- Appropriate information sharing on a need-to-know basis.

All safeguarding concerns submitted by email must be reviewed by a DSL or DDSL and recorded on the iSAMS Wellbeing Module at the earliest opportunity. The DSL is responsible for quality assurance of safeguarding records and regular review of safeguarding chronologies.

5.8 Confidentiality and information sharing

- The school recognises its duties under the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025. Information sharing is vital to safeguarding and promoting the welfare of children. Staff will proactively share relevant information with appropriate professionals and agencies where necessary to safeguard children.
- All information obtained by school staff about a student will be kept confidential and will only be shared with other professionals and agencies to safeguard and promote the welfare of the child.
- Parental consent to information sharing is not required although parents should normally be informed that a referral will be made unless this would cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to safeguard the child.
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.
- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the school's duty to share information.
- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with CSFH and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by CSFH.
- Schools have a lawful basis for sharing safeguarding information under UK GDPR and the Data Protection Act 2018 where this is necessary to protect a child or promote their welfare.
- Information may be shared without consent where there is a safeguarding concern, risk of harm, public interest justification or another relevant legal basis. Data protection legislation does not prevent the sharing of information for safeguarding purposes.
- 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 practitioner.
- The governing body will take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

6 Health and safety and risk assessments

6.1 Responsibility for health and safety

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

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

Health and safety: responsibilities and duties for schools - GOV.UK

Day-to-day responsibility for health and safety issues 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: Kelly Moore

Designation: Business Manager

Contact details: kmoore@guildhouseschool.com

6.2 Risk assessments

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

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

6.3 Working with aggressive and violent parents

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

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

6.4 Site security and visitors

- The 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 – there is only one entrance to the school opened with a secure key card. There are then barriers inside of the building (turnstiles).
- In general, occasional visitors to the school such as parents will not be subject to DBS checks but their movement around the premises will be supervised.
- The headteacher and the board of governors will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school policies.
- The headteacher 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 students.
- Contracted workers will not be allowed to approach or speak to students in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- All contractors working on school premises are managed in accordance with the school's Recruitment and Selection Policy.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the headteacher will request written confirmation that relevant checks have been carried out for that individual.
- Visiting organisations such as theatre groups who will be performing for or working directly with students 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 students.
- Visiting speakers will be vetted in line with the Visiting Speakers Policy, whether invited by staff or students, and will always be supervised.
- All visitors and contractors will be:
    - informed to report to reception on arrival;
    - expected to provide proof of identity;
    - expected to wear a visitors lanyard and ID sticker at all times when on the school premises;
    - suitably supervised by school staff at all times;
    - made aware of school health and safety procedures.

6.5 Use of the school premises by other organisations

The school will only allow use of the school premises by other organisations outside of school hours for the purposes of providing supplemental schooling if the organisation can demonstrate it is able to keep children safe. The governing body or proprietor will ensure::

- the school's 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 copies of child protection policies and procedures and the school accept these as adequate;
- the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks;
- the following reasonable and due diligence checks are taken out on the organisation by the school;
    - an internet search on the organisation
    - checks with Camden's Community Groups and Schools Consultant (020 7974 7319)
    - checks with Prevent Education officer (020 7974 1008)
    - checks with Camden Community Safety and the local police (020 7974 2915)
- details of the agreement are recorded on the partnership agreement record with clear provision for the circumstances under which the agreement can be terminated by the school for breach.

Organisations will be expected to meet the requirements set out in the Department of Education guidance below before the school will allow the premises to be used.

https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during-community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings

Any allegations arising from incidents happening when the school is being used by another organisation should be dealt with by the school under the CSCP Guidance for schools on dealing with allegations against staff and volunteers.

https://cscp.org.uk/professionals/managing-allegations-against-staff-and-volunteers-lado/

Resident Adults in Boarding Accommodation

In accordance with the National Minimum Standards for Boarding Schools and the school's safeguarding responsibilities, all resident adults whether employed by the school or not, are required to undergo an Enhanced DBS check with a Barred List check prior to taking up residence. This includes spouses, partners, and other household members of boarding staff.

Any visitors to boarding accommodation must comply with the school's Visitors Policy. Visitors are not permitted to have unsupervised access to students and must be accompanied at all times. Staff are responsible for ensuring that visitor arrangements uphold the school's safeguarding standards.

6.6 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 headteacher and the board of governors will ensure that;

- all school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the headteacher and governing body;
- This Safeguarding and Child Protection Policy should be read in conjunction with the school's/CGS: Recruitment and Selection Policy, Staff Code of Conduct (Appendix 4),Low-Level Concerns Policy and Online Safety Policy;
- Together, these documents form a comprehensive framework for safeguarding and promoting the welfare of children. They outline expectations for staff behaviour, recruitment practices, and the management of concerns at all levels.
- 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 headteacher has an overview of all accidents/incidents;
- serious accidents and incidents are reported to the board of governors;
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children;
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns and agreeing to any course of action.

6.7 Safeguarding and school premises

The school will comply with statutory requirements in relation to school premises, including ensuring that students use toilet, changing and washing facilities designated for their biological sex, in line with safeguarding obligations.

The school will ensure that single sex toilets are available and students will not be allowed into toilets designated for the opposite sex. Where a child who has made a request for social transitioning and does not want to use their designated toilet, the school will look at providing alternative facilities such as a designated individual toilet when dealing with the request in order to preserve the safety, dignity and privacy of all students.

The school will ensure that suitable single sex changing rooms and showers are available for students and they will not be allowed to use facilities designated for the opposite sex. Where a student who has made a request for social transitioning and does not want to use their designated facility, the school will look at providing alternative for changing and washing when dealing with the request in order to preserve the safety, dignity and privacy of all students.

Part B: Additional safeguarding policies and procedures

B1 Children who are missing or absent from education or home educated

Schools need to be aware of those children who are persistently absent or missing from school and be aware of the link between being missing from school and safeguarding concerns.

The school will ensure there are clear safeguarding systems in place to respond to children who are absent from education, particularly on repeated occasions or for prolonged periods, recognising this as a potential indicator of safeguarding risk.

The school is aware of those students who are persistently absent from school from the daily/hourly attendance record. The Attendance Policy, Missing Student & Supervision Policy states clearly who needs to be notified and what action should be taken and any relevant timescales.

The school endeavours to maintain at least two emergency contacts for every student and will seek regular confirmation that contact information remains accurate and current.

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

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

In line with the statutory guidance Working Together to Improve School Attendance Working Together to Improve School Attendance – GOV.UK, the school recognises the importance of early identification and intervention for students who are persistently absent. Attendance concerns will be treated as potential safeguarding issues and addressed through multi-agency collaboration where appropriate.

B2 Child on child abuse

The school recognises that child on child abuse is a safeguarding issue for both victim and perpetrator and will take steps to intervene early to prevent children from behaving abusively. The school will ensure that all staff are aware of child-on-child abuse and know what action to take when a student's behaviour is likely to cause harm to other students.

Given the age and stage of our students, sexual relationships between children are inevitable. The school's Personal Development programme, inclusive of RSE, teaches about healthy relationships, consent, and respect. This helps safeguard students and enable them to engage in healthy sexual relations.

Sexual activity of any kind on site is prohibited. Any such activity would result in disciplinary action in accordance with the Stage Warning Ladder as part of the Student Behaviour Policy. For boarders, the risks of sharing overnight accommodation are reduced because of the layout of the building and the fact that rooms are single or twin, all of which are not accessible to other students.

Staff should know what action to take when a student's behaviour is likely to cause harm to other students. This may be through:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, sexual harassment and harmful sexual behaviour
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting
- sexting
- initiation rites/hazing type violence and rituals.

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

Any such concerns must be reported to the DSL (or a DDSL) who will then consider the case and whether it should be dealt with at a local level or whether the abuse meets the threshold for referral to the Camden MASH.

All staff must challenge such abusive behaviour and promote a zero-tolerance approach to it – not accepting excuses for it (e.g. banter) – as this can lead to a culture of unacceptable behaviours. Staff must also accept that whilst there may be no reported cases, it is likely that such abuse is taking place within the school but not reported (likely because of the 'normalisation' of such abuse). That said, the school adopts a position of 'it is probably happening here'.

The risks are minimised by educating students on healthy relationships and understanding safeguarding through Induction to the school and PSHE. Students know how to report abuse and who to go to, knowing their concerns will be taken seriously and that they are not creating a problem by disclosing the abuse, but doing the right thing and they should not feel ashamed in any way (as with any safeguarding concern).

Our alumni: If an alumnus has experienced any form of child-on-child abuse and not previously reported it, we strongly encourage them to contact the school. We would advise them to either contact the Designated Safeguarding Lead or the Headteacher.

Harmful sexual behaviour, sexual violence and harassment

The school recognises that sexual violence and sexual harassment between students is a serious safeguarding issue, and such behaviour will not be tolerated. All incidents involving sexual violence or sexual harassment between students will be dealt with under the Child on child and sexual

violence and harassment guidance for schools and colleges guidance and the Harmful sexual behaviour protocol. https://cscp.org.uk/wp-content/uploads/2024/05/CSCP-harmful-sexual-behaviour-protocol-2022.pdf

The school recognises that harmful sexual behaviour exists on a continuum from inappropriate behaviour through to abusive behaviour and sexual violence. Incidents will be considered in the context of the age, developmental stage, capacity and understanding of the children involved. Early identification and intervention are essential. The school will consider the needs of both the alleged victim and the alleged perpetrator, recognising that children who display harmful sexual behaviour may themselves have experienced abuse, trauma or exploitation. Appropriate risk assessments, safety planning, education, support and referral to external agencies will be implemented where required. The school acknowledges that children displaying harmful sexual behaviour may themselves be victims of abuse and will ensure that safeguarding responses address both risk management and underlying welfare needs.

B3 Preventing children from being drawn into radicalisation and terrorism

The school has a duty to work in partnership to safeguarding children from being drawn into radicalisation and terrorism. This is set out in the *Prevent Duty guidance 2023.*

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

The school will follow the DfE guidance on the above areas including a sample 'risk assessment' template. This includes carrying out a risk assessment to ensure that activity is focused on the types of risks that are being seen in school.

The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK

The school will follow the guidance set out in the CSCP guidance "Safeguarding children and young people from radicalisation and extremism" where:

- a school has concerns that a young person might be developing an extremist ideologies or mindset and/or may be being radicalised and would benefit from specialist, or
- that a child may be at risk due to a household or family member's radicalisation.

The school should also be aware of any child who may be fixated on violence or considering mass violence even where it does not seem to be linked to a specific ideology as a concern which may benefit from Prevent support/advice.

The guidance is available at: https://cscp.org.uk/resources/radicalisation-and-extremism-resources/

Schools should always be a safe space for young people to explore new ideas and perspectives and develop their critical thinking skills. Where there are concerns about radicalisation these concerns should be shared with the designated safeguarding lead and a decision taken as to whether concerns need to be raised with CSFH for a referral under the Prevent duty for support from the Channel Panel.

Prior to making a referral the school may also speak to and get advice from Camden's Programme Manager; safeguarding against radicalisation
(Jane Murphy, jane.murphy@camden.gov.uk or call 020 7974 1008).

The school 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 and to build resilience to radicalisation through the curriculum.

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

The school Personal Development Programme and associated PSHE/RSHE lessons will address areas of support where students may be encouraged to develop their resilience to extremism and radicalisation.

B4 Mandatory reporting of Female Genital Mutilation (FGM) and Children at risk of 'Honour-Based' Abuse (HBA)

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK.

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

Multi-agency statutory guidance on female genital mutilation - Publications - GOV.UK

Where a student makes a disclosure of FGM, the school will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the CSCP guidance available at: CSCP-mandatory-reporting-guide.pdf

All concerns around FGM, including any disclosure made by a student, will be discussed with the designated safeguarding lead before any action is taken. Although it is good practice for professionals to consult with their agency's designated safeguarding lead prior to reporting, this should not hold up making a report.

Honour-Based Abuse can be defined as:

'An incident or pattern of violence, threats of violence, intimidation, coercion, control or abuse (including but not limited to psychological, physical, sexual, economic, spiritual, faith-related or emotional abuse) motivated by the perpetrator's perception that an individual has shamed, or may shame, the perpetrator, the family, or community or has otherwise broken, or may break, the perceived norms of the community's accepted behaviours, including by speaking out about the abuse and where the perception of shame may also prevent a victim from accessing support or help.'

The school takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

The Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

The School will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

B5 Online safety

The school has a separate policy for Online Safety. As part of its duty to provide a safe learning environment and ensure students are taught how to remain safe online, the school implements the recommendations of Camden's model schools' online policy.

The school is aware of the risks of the use of mobile technology in school. Many students have unlimited and unrestricted access to the internet via 3G/4G/5G in particular and the school has procedures outlined in the Online Policy which advises students how to manage their mobile use in school and away from school. The school takes a thorough educational line (education rather than regulation) to help students navigate the online world. It encourages them to recognise and report incidences affecting them or other fellow students. Students are more likely to have such knowledge of other students' online behaviour than staff and therefore encouraging reporting is the most effective approach in this context. In line with KCSIE 2026, the school educates students and staff about emerging online risks, including misinformation, disinformation, conspiracy theories, and AI-related threats such as deepfakes and generative content. Staff are trained to recognise and respond to these risks, and the Central IT team uses the DfE filtering and monitoring self-assessment tool to evaluate and improve its systems.

The school has adequate filtering systems to keep students safe when accessing the internet through the school Wi-Fi network. Usage is monitored monthly by the Central IT function and the school uses Securly, a cloud-based web filtering and student safety platform, to monitor online activity and help maintain a safe digital environment. Securly provides real-time alerts for concerning behaviour, supports safeguarding staff with visibility of student and staff browsing activity and helps enforce appropriate internet use across devices. The DSL regularly reviews reports and alerts to identify potential risks and respond accordingly. The DSL works closely with the Head of Central IT to evaluate the effectiveness of filtering and monitoring systems, identify emerging online safeguarding risks and ensure appropriate safeguarding responses. Filtering and monitoring arrangements are reviewed regularly and form part of the school's wider safeguarding oversight framework.

The school is aware of national resources that support online safety and safeguarding practice. These include the Lucy Faithfull Foundation's Shore Space, which offers support for young people affected by harmful sexual behaviour; the CSA Centre's toolkit for identifying and responding to child sexual abuse; and the DfE filtering and monitoring self-assessment tool. These resources are reviewed by the DSL and may be incorporated into staff training or safeguarding updates as

appropriate. The school signposts CEOP Education resources to support online safety and safeguarding, including the CEOP Safety Centre for reporting online abuse: www.ceop.police.uk.

The school is aware of the Department for Education's guidance on the safe and effective use of artificial intelligence (AI) in education (August 2025) https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education/generative-artificial-intelligence-ai-in-education . These resources are reviewed by the DSL and used to inform future updates to safeguarding and online safety practices and training.

B6 Looked after and previously looked after children and care leavers

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

The school's designated teacher for LAC and care leavers has access to specialist knowledge of the issues faced by this cohort. The nominated member of staff is the designated safeguarding lead. The school rarely (if ever) has such students on roll. If the school does have such a student on roll, the DSL will consult with the CSCP to seek advice. The school recognises that Virtual School Heads now have responsibilities not only for looked after children but also for those in kinship care arrangements. Where a student is known to be in kinship care, the DSL will liaise with the Camden Virtual School Head to ensure appropriate educational support and safeguarding oversight is in place.

B7 Children with special education needs or disabilities (SEND)

The 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 communications difficulties and professionals may miss vital indicators.

School policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. The school will follow the recommendations of an Educational Psychologist where a student has been identified as requiring a SEND assessment and subsequent advice given. The school will follow the CSCP guidance Safeguarding children with disabilities available at:

https://cscp.org.uk/wp-content/uploads/2023/09/Safeguarding-children-and-young-people-with-disabilities-Guidance-2023.pdf

Where there are concerns about abuse involving a student with SEND, the designated safeguarding lead will liaise with the SENCO, CSCP and/or an external expert. The school will consider extra pastoral support for students with SEND including extra help in supporting communication. In line with the SEND Code of Practice and KCSIE 2026, the school is committed to using inclusive and child-preferred language when referring to students with SEND. Terms such as "disorder" or "spectrum" are avoided unless clinically appropriate and preferred by the child or their family. Staff are encouraged to focus on the child's strengths and needs rather than labels, and to ensure that communication is respectful, empowering, and tailored to the individual.

B8 Safeguarding vulnerable groups

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

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

Children who have an allocated Family Help Practitioner

The school recognises that children who are receiving a service from Family Help and who are subject to a Family Help plan or child protection plan are likely to have experienced abuse, neglect and trauma and that this could have a negative effect on their behaviour and learning.

CSFH practitioners will inform schools whenever a child is receiving a service and the designated safeguarding lead will keep a record of all students who have an allocated Family Help practitioner and children who are living in kinship arrangements.

The school will work in partnership with Family Help practitioners and the Camden Virtual school head to implement the child's plan in order to support their education and safeguard and promote their welfare. A representative of the school who knows the student well will become part of the professional network and will share information about safeguarding risks and attend planning meetings. In their absence, a suitable colleague will deputise for the member of staff or a written report will be provided for meetings. The designated safeguarding lead will maintain awareness of children who need a social worker and children living in kinship arrangements and ensure this information informs safeguarding, attendance and welfare decisions.

Children at risk of forced marriage

Forced marriage - Detailed guidance - GOV.UK

Domestic abuse and/or sexual violence

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

CSCP-domestic-abuse-guidance-2025.pdf

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

Privately fostered children

https://cscp.org.uk/resources/private-fostering-resources/

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

Young carers

The school is aware of the impact of caring responsibilities can potentially have on children's attendance, attainment and wellbeing and will take steps to ensure young carers are identified and supported.

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

If schools have concerns about a student, they believe to be a young carer, they can contact the MASH on 020 7974 3317 for advice and can refer the student on for services and support. Camden also commissions services and support from the Children's Society; for more information refer to: https://ascpractice.camden.gov.uk/media/d4ckeb2j/young-carers-icyc-leaflet.pdf

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

The school recognises that LGBT students, or students who are perceived to be LGBT, may be more vulnerable to bullying, harassment and victimisation and may find it difficult to disclose to staff due to a lack of trust in adults. The school will provide safe spaces and opportunities for LGBT students to raise concerns and will ensure that LBGT inclusion is part of the sex and relationships curriculum. The school will take appropriate action against homophobic behaviour and use appropriate sanctions.

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

The school will maintain written records of decisions and support arrangements for gender-questioning children and review arrangements regularly. Relevant staff must be aware of a child's biological sex where required for safeguarding purposes.

The school should not take unilateral action in respect of gender questioning children in general but only respond to requests from students and parents. When considering a request to take part in a single sex sport that involves safety concerns the school must make the decision based on the general principles relating to decisions on social transitioning, including the safety and welfare of the student making the request and other students who may be affected.

When considering requests, the school should have regard for the regulations on toilets and changing rooms (please refer to section 6.7) The school takes a cautious, child-centred approach, balancing safeguarding responsibilities with sensitivity to each child's individual needs and circumstances.

Decisions regarding support arrangements for gender-questioning children will be led by the Headteacher and DSL, with appropriate involvement from parents/carers and relevant professionals where appropriate.

B9 Extra-familial harm and exploitation

The school is aware of the risk to children and young people from extra-familial harm and staff will be vigilant to the indicators of extra-familial harm in relation to students at all times.

Whenever staff are made aware of any safeguarding incident or concerning behaviour that has taken place out of the home and that has put a student at risk, staff will discuss the matter with the designated safeguarding lead and consider the level and nature of the risk before making decisions on referrals.

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

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

- child sexual exploitation
- child criminal exploitation including county lines
- modern slavery and trafficking
- gang activity and youth violence
- radicalisation.

Exploitation is a form of abuse involving an imbalance of power within a relationship that allows one party to use this power to manipulate another to carry out an act. The victim may believe that they are acting on their own accord but in fact their consent has been obtained through deception, duress or force and threats of violence. They may also be moved into the UK or around other towns and cities in the UK to facilitate their exploitation. The exploitation of the young person is a form of modern slavery and their forced movement is trafficking, both of which are criminal offences.

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

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

CSCP-extra-familial-harm-and-child-exploitation-guidance.pdf

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

- county lines
- benefit fraud
- forced theft
- forced begging
- cannabis cultivation

- money mule (where the young person's bank account is used by others for money laundering).

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

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

It should be noted by staff that children who are criminally or sexually exploited or trafficked are not giving informed consent and consequently should be considered a victim rather than a criminal. Young people who are criminally exploited are also at increased risk of experiencing sexual exploitation.

Young people at risk from gang activity or serious violence

The school will take all necessary measures to safeguard pupils from the threat of serious violence in all forms, from possession of weapons to physical violence and threats of violence by students towards peers.

Staff will be alert to any signs that a student is involved in serious violence or otherwise poses a risk to peers and the school will work to reduce any risk including the use of suspension or permanent exclusion as appropriate. Staff will be alert to indicators of serious violence, including possession or use of weapons, peer conflict, criminal exploitation, changes in friendship groups, unexplained injuries, poor attendance and declining educational performance. Concerns will be referred immediately to the designated safeguarding lead. The school will work to prevent serious violence through the PHSE programme to ensure a safe learning environment.

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

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

Children who run away/go missing

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

The school should also be aware that many of these forms of risk and exploitation are linked and that going missing from home or from education can be an indicator that young people are involved in child sexual exploitation, gang activity, modern slavery, criminal exploitation and trafficking. The school recognises that children who go missing from home or school are at an increased risk of being groomed for and becoming a victim of child exploitation.

B10 Children and young people experiencing mental health issues

The school recognises that some students may experience mental health issues that can negatively affect their behaviour and their ability to participate fully in education and may lead to safeguarding concerns.

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

CYP-mental-health-protocol.pdf (cscp.org.uk)

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

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

Indicators of mental health difficulties that staff should be aware of include significant changes in behaviour, sleep difficulties, social withdrawal, signs of self-harm and suicidal ideation. Staff can also find more information from the following website:
https://www.mentallyhealthyschools.org.uk/whole-school-or-college-resources/targeted-support/

The school will ensure that staff are teaching about mental wellbeing (as part of the statutory Health Education) to promote good mental health and help reduce the stigma attached to mental and emotional problems and ensure students know how to keep themselves mentally healthy and know how to seek support.

The school will also ensure early identification of students who have mental health needs and put in place appropriate support and interventions, including specialist services, where needed.

The school will take account of the government guidance Mental health and behaviour in schools.

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

The school has a separate Mental Health Policy which works to promote the positive mental health and wellbeing of all the school community to enable them to flourish.

The mental health lead is the DSL. There is also a full-time school nurse (a DDSL) and a part-time wellbeing counsellor. Where a student is assessed as requiring additional specialist support beyond the capacity of the school counsellor with regards to their mental health, the school has a working relationship with a well-qualified and experienced psychologist.

To facilitate the fact that the school may be required to shift learning from physical to online for whatever reason, students are all trained how to use MS Teams responsibly and safely upon induction to the school. Students know how to access the DSL remotely via Teams (they know who the DSL/DDSLs are or can find out via their Personal Tutor). Staff are aware to use the school email system and Teams to communicate with students and not personal accounts. All students and staff have school MS 365 accounts.

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B11 Children with Medical Conditions and Allergies

The school recognises that failures to provide appropriate support for children with medical conditions, including serious allergies, may in some circumstances indicate neglect or place a child at risk of harm.

Concerns regarding repeated failures by parents, carers or others to provide essential medication, treatment information or medical support will be considered within safeguarding processes and discussed with the DSL.

The school will work closely with students, parents, healthcare professionals and boarding staff to ensure that medical conditions are appropriately supported and risks are managed safely.

Appendices

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, CSFH 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 , neglect or exploitation

Neglect	• Inadequate or inappropriate clothing • Appears underweight and unwell and seems constantly hungry • Failure to thrive physically and appears tired and listless • Dirty or unhygienic appearance • Frequent unexplained absences from school • Lack of parental supervision
Physical abuse	• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury • Injuries in unexpected places or that are not typical of normal childhood injuries or accidents • High frequency of injuries • Parents seem unconcerned or fail to seek adequate medical treatment
Sexual abuse	• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development • Sexual risk taking behaviour including involvement in sexual exploitation/older partner • Continual, inappropriate or excessive masturbation • Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy • Unwillingness to undress for sports

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Emotional abuse	• Developmental delay • Attachment difficulties with parents and others • Withdrawal and low self-esteem
Indirect indicators of abuse and neglect	• Sudden changes in behaviour • Withdrawal and low self-esteem • Eating disorders • Aggressive behaviour towards others • Sudden unexplained absences from school • Drug/alcohol misuse • Running away/going missing
Parental attributes	• Misusing drugs and/or alcohol • Physical/mental health or learning difficulties • Domestic violence • Avoiding contact with school and other professionals

Appendix 2: Safeguarding Recording Procedures

Safeguarding records should include:

- Student name and preferred name.
- Date of birth.
- Year group.
- Boarding/Independent Accommodation status.
- SEND information relevant to safeguarding.
- Relevant medical information.
- Ethnicity, religion, nationality and first language may be recorded where relevant, necessary and proportionate to understanding safeguarding risk, vulnerability, communication needs or support requirements.
- Nature of concern.
- Student disclosures.
- Discussions with staff.
- Risk assessments.
- Decisions made.
- Actions taken.
- Referrals.
- Outcomes and follow-up actions.

Personal information will only be recorded where necessary, proportionate and relevant to safeguarding.

Safeguarding Recording Pathway

Concern identified

↓

Immediate report to DSL/DDSL

↓

Staff submits written account via email or requests a meeting

↓

DSL/DDSL reviews information and arranges follow up meeting with staff member

↓

Concern recorded on iSAMS Wellbeing

↓

Risk assessment and safeguarding action

↓

Referral / Monitoring / Early Help

↓

Outcome recorded

Expectations for Staff

Staff must:

✓ Report concerns immediately.

✓ Record concerns factually.

✓ Use the student's own words where possible.

✓ Submit concerns on the same day.

✓ Continue to share concerns even if they appear minor.

Staff must not:

✗ Investigate.

✗ Promise confidentiality.

✗ Delay reporting.

✗ Remove, alter or delete safeguarding records.

Appendix 3: Legal duties

Human Rights Act 1998

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

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

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

Equality Act 2010

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

Schools must be able to demonstrate that they have taken proportionate positive action and/or made reasonable adjustments in order to deal with the disadvantages faced by these groups. For more guidance see:

Equality Act 2010: advice for schools - GOV.UK (www.gov.uk)

Equality Duty

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

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

Appendix 4: Staff Code of Conduct

All members of staff are expected to behave in a professional manner. This includes promoting the school values, leading by example, and consistently applying and upholding the Student Behaviour Policy.

It is expected that what constitutes professional behaviour in a school is obvious and common sense. Nonetheless, some example guidance is detailed below (though this list is not exhaustive):

- Staff are in position of trust with any student (regardless of age) and they must always be respectful of such relationships.
- Never make sexually suggestive comments to students in jest or fun, or engages in rough, physical or sexually provocative games, including horseplay.
- Never ask for personal information without providing an explanation of the reason for asking it and how the information is going to be used and stored and do not guarantee confidentiality and privacy.
- Never do things of a personal nature for a student that they can do for themselves.
- If a student approaches you inappropriately, discourage them and ensure you implement safe working practices such as: you are never alone with them, informing your line manager immediately or as soon as possible. In addition, make a written record of what has happened, including dates and times; what you said to your student; whom you spoke with after the event; and what advice you were given.

- If you find yourself in the position of teaching one-on-one always notify your line manager or another member of staff of the situation. If you must move location, then this also needs to be made known. Always leave the classroom door open and always make sure the student sits nearest the door. Where this is not possible, never obstruct the exit pathway of the student by placing yourself between the exit and the student.
- If you must speak to a student on a personal matter, it is always best practice to have another member of staff present. Where this is impossible, notify your immediate line manager prior to speaking to the student and where this is not feasible then as soon as you possibly can and remember to record notes about the interaction.
- If you are teaching a subject which requires physical contact to support your teaching such as in music or sports, ensure that you have made the student aware that physical contact is required, i.e. "I am going to show you how to place your arm. Is it ok if I hold your arm?" You should never engage in physical contact without prior agreement with the student.
- Staff must be respectful of supervision of changing room areas.
- It is not appropriate for staff to socialise with students without the school being aware, and it is not appropriate for staff to use chat rooms or other online forums not set up by the school to communicate with students (E.g., Facebook and Instagram). Staff should always communicate within clearly defined boundaries.
  Staff should ensure that:
    - Personal social networking sites are set at private and never listed as approved contact.
    - Staff never use or access social networking sites of students.
    - Staff do not give their personal mobile details to students, including their mobile telephone number.
    - Staff only use official school mediums on their own devices to communicate with students (Teams, Outlook, Office 365, Canvas). Staff may take photos on their own devices for educational/school purposes – but as soon as feasibly possible, these should be transferred to the school network and deleted from the personal device.
    - Staff only contact students for professional reasons and in accordance with any school policy.
    - Staff do not use internet or web-based communication channels to send personal messages to a young person.
    - Staff may not register or post on the school Facebook page without the express permission of the headteacher. If posting, a new account must be created without any personal details or friends on and students may not access any personal information about you. Your school email should be used to sign up and not a personal one.
    - Staff should not use personal mobiles to contact students at any time.
    - Staff should not use personal cameras to take pictures of students.

- Staff may not drive students in their own car unless they have business insurance and have logged all documents. Any student needing transportation must therefore be transported by our registered Taxi company whose drivers are all DBS checked.
- Staff must follow procedures when entering student areas in boarding especially their personal spaces. Students must not access staff quarters or staff living areas unless instructed to do so in an emergency to call on a member of staff.

- Staff must read and understand the Anti-Bribery policy which explains the giving and receiving of gifts by students and staff.
- Staff must read and understand the Whistle-blowing policy.
- Staff must understand the importance of not sharing information with others about students or parents which they have gained confidentially.
- Always avoid using inappropriate or offensive language whilst in the presence of or students and colleagues.
- Dress appropriately and in a professional manner.
- Not seriously demean or undermine students, their parents/carers/agents or colleagues.
- Always take reasonable care of students under your supervision with the aim of ensuring their safety and welfare.
- Avoid putting yourself at risk of allegations of abuse or unprofessional conduct.
- Do not reveal any political leanings you may possess – remain impartial and balanced. Encourage considering and respecting all views and opinions within the sphere of British Values.
- Champion equality, diversity and inclusion and promote a non-judgemental approach. Always challenge behaviour that contravenes this.

As the University Foundation Programme has a shelf life of two years and students can re-sit A Level papers after a student has left the school, it is not considered appropriate for staff to have contact with former students for at least two years after they have left the school. Staff may however contact students or former students at any time using school email for a legitimate reason.

In terms of physical contact with students, always consider whether behaviour is situationally appropriate - a hug initiated by the student at graduation in the presence of others would be viewed differently to a hug initiated by you alone in a classroom. Again, with any allegation, history of initiating contact is seen as an aggravating factor.

NB The above guidance should not be considered exhaustive and more detailed guidance may be required for specific posts/activities.

Concerns regarding a member of staff

The message to all staff is this: if you are concerned about a member of staff, speak directly to the headteacher (or in their absence, the Chair of Governors) without informing the adult who is the subject of the concern. The headteacher is available through Teams, email or in person and should be alerted to the fact that there is a concern regarding a member of staff. If your concern involves the headteacher, speak to the Chair of Governors.

The headteacher will determine whether the concern meets the threshold for an allegation. All allegations must be reported to the LADO immediately and within one working day in a serious case where a crime has been committed, the police must be informed. The headteacher may call the LADO for advice if it is unclear whether the threshold has been met or for general advice regarding the concern if deemed necessary. The headteacher will also likely seek counsel from the DSL in any case. For concerns that do not meet the threshold, the low-level concerns policy will be followed.

Staff include the DSL, supply staff, contractors and volunteers. For supply staff/contractors, the agency/employment business must be kept fully informed and involved, regardless of whether this is

a serious concern or a low-level concern. The recording of low-level concerns enable patterns of inappropriate behaviour to be identified.

If a member of the resident boarding staff is suspended due to suspected child protection concerns, alternative accommodation will be provided.

In cases of serious harm, the police will be informed from the outset.

Low-level concerns policy

The school is committed to ensuring Low-Level Concerns are monitored, recorded and dealt with appropriately to create a safer culture for all staff, students and visitors. There is a separate policy for recording low-level concerns.

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 students or poor practice within the school that may cause a risk to students.

The school recognises that there may be circumstances where staff and students 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 students. 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 student;
- 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 734199
    - the Ofsted whistle-blowing line on 0300 123 3155
    - the NSPCC whistleblowing helpline on 0800 028 0285.

The headteacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and students.

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Appendix 5: School's safeguarding checklist

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

Name of school:

Address:

Headteacher:

Contact details:

Date of safeguarding assessment:

Requirement	Yes	No	Comments/action
Leadership and the safeguarding and child protection framework			
The school has comprehensive safeguarding policies covering early help and child protection, behaviour management and a staff conduct policy covering use of technology, relationships with students, communications and use of social media			
The school has agreed procedures for dealing with incidents of sexual violence and sexual harassment that are linked to the school's behaviour and bullying policies			
There are agreed local procedures in place for making referrals to CSFH where there are concerns about the safety and welfare of a child			
There is a designated governor with responsibility for safeguarding and child protection			
The school and governing body is aware of duties under the Human Rights Act 1998 and the Equality Act 2010			
A senior member of the leadership team has been appointed as the designated safeguarding lead and a nominated deputy to carry out the role in their absence and they have the time and resources allocated to carry out their responsibilities			
The safeguarding lead and their deputy have received safeguarding and child protection training at the appropriate level on appointment and this training is updated every 2 years.			
Arrangements are in place to ensure staff can liaise with the safeguarding lead or their deputy at all times during school hours			

The school promotes a multi-agency approach to safeguarding and child protection in line with *Working together* and staff are able to attend child protection conferences and other multi-agency meetings as appropriate			
The school is represented on the Camden Safeguarding Children Partnership			
The school has taken steps to implement Operation Encompass and have a process for dealing with police notifications of domestic abuse incidents			
The curriculum offers opportunities for students to learn how to keep themselves safe, including online, and offers students guidance on healthy relationships in line with the new statutory duty to provide relationships and sex education.			
The school promotes positive behaviour and this is reflected in behaviour management strategies used; reasonable force and restraint is used only in line with legislation; use of any behaviour management strategy is tailored to the needs of the pupil and carefully monitored for effectiveness; efforts are made to reduce the use of physical intervention and restraint for vulnerable children.			
The school has effective policies for dealing with bullying and discrimination, including cyberbullying, sexting, upskirting and inappropriate language			
The school has effective policies for dealing with sexual violence and sexual harassment between students			
There is a policy around dealing with allegations against staff and all staff are aware of the policy and know what action to take if they have concerns about another member of staff			
The school has a policy of openness and challenge and staff and students feel safe to raise concerns; there is a whistleblowing policy in place and all staff and students know who to contact if they are concerned that safeguarding issues are not being adequately dealt with by the school			
The school have taken steps to implement the Prevent duty and staff are aware of how to make appropriate referrals to Channel Panel			
The school has a child on child abuse policy dealing with children who harm other children and all staff are aware of what action to take under this policy			
The school seeks the views of students and parents with regard to safeguarding issues and all safeguarding and child protection policies are available on the school website;			
The school has adequate filtering and monitoring systems in place, regularly reviewed by the DSL;			

Staff knowledge and safeguarding practice			
All staff are inducted in safeguarding arrangements in the school and have received and read all relevant policies			
Staff are aware of the safeguarding culture of the school and their role in challenging inappropriate behaviour and language and being vigilant to child on child abuse			
All staff and governors receive safeguarding and child protection training on appointment and receive safeguarding updates, including online safety, at least annually.			
All staff receive regular updates to safeguarding and child protection legislation via the designated safeguarding lead as required			
All staff are able to identify those children who may benefit from early help and are able to provide support within the school or make appropriate referrals to Camden's Early help service			
All staff are able to recognise the indicators of abuse and harm, can identify children who may be at risk of harm *and those who may be vulnerable to harm including LGBT children, those with family help practitioners , those with SEND*			
All staff know what action to take to refer children appropriately to CSFH where there are concerns and make timely referrals and follow up referrals where it is thought the child's situation is not improving			
All staff are aware of their legal duty under the mandatory reporting rules for FGM and can make appropriate notifications to the police and CSFH in known cases of FGM			
All staff are aware of extra-familial harm and the indicators that a pupil may be at risk from harm within the community, particularly through criminal and sexual exploitation, and know what action to take to refer the pupil on for safeguarding			
All staff are aware of what actions to take when a child goes missing or absent from education or does not attend and that missing episodes are monitored; all staff are aware of the link between going missing and safeguarding issues such as sexual exploitation, criminal behaviour, substance misuse and trafficking; there are procedures in place to notify Camden where a child is removed from the school roll in line with the local *Children missing/absent from education* policy			
All staff are aware of how harm, abuse, neglect and trauma can impact on pupil's mental wellbeing and can recognise those students who need help with their mental health; all staff know what actions to take to signpost or refer students who need a mental health service.			

All staff are able to share information lawfully and appropriately and work jointly with partner agencies; parents are informed of concerns and actions taken unless this puts the pupil at further risk			
Records of concerns and referrals are up to date and timely and kept securely			
All staff receive regular supervision that enables them to raise safeguarding issues			
Risk assessments are routinely carried out to ensure the health and safety of students on site, on school trips and during work experience			
Students feel safe and are aware of how to raise concerns and complaints with a trusted adult			
Safer recruitment			
The school has a safer recruitment procedure that is in line with statutory requirements			
The school has a single central record providing details of when and by whom the following checks on candidates were taken out: • Identity checks • DBS/barred list checks • Prohibition from teaching/section 128 checks • Appropriate checks with oversees organisations where the candidate is from abroad • Checks to establish right to work in the UK • Professional qualifications check • Checks on individual's social media accounts			
The school has a clear system in place in line with statutory requirements for volunteers or contractors coming into the school. Enhanced DBS checks are taken out on all staff members, volunteers and governors; barred list checks are also taken out on staff, volunteers and governors who are involved in regulated activity			
The headteacher or other member of the senior leadership team decides on whether or not volunteers, visitors or contractors require a DBS check and this decision is informed by a risk assessment; arrangements are put in place to supervise and oversee volunteers, visitors and contractors where a DBS check is not carried out and children are not left unsupervised with any individual who has not undergone a DBS check			
The school seeks written confirmation from agencies that these checks have been taken out on all agency and supply staff prior to appointment; all agency and supply staff are required to present proof of identity prior to beginning work			

A member of the governing board or senior leadership team involved in interviewing has completed an accredited safer recruitment training course			
Dealing with allegations against staff			
There is a named staff member with responsibility for liaising with the police and LADO for all staff subject to allegations, including supply staff			
Appropriate referrals are made to the DBS where staff cease to work at the school following investigation into allegations			
The school/college has a system in place to deal with low-level concerns about staff that do not reach the threshold to be dealt with under the allegations procedures *and how to seek advice from the LADO where it is not clear if the threshold has been reached*			

Appendix 6: Other relevant policies

School may access guidance on the following policies at www.nspcc.org.uk and Department for Education - GOV.UK in addition to reference to the school policies

Alternative provision

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

Attendance Policy

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

Behaviour and discipline

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

Student Behaviour Policy

Bullying (including cyberbullying)
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288444/preventing_and_tackling_bullying_march14.pdf

Anti-Bullying Policy

Children missing education

Children missing education: statutory guidance for local authorities and schools - GOV.UK

Complaints Policy

Substance Misuse Policy

Drugs: advice for schools - Publications - GOV.UK

Educational visits Policy

Equality and diversity Policy

Fabricated or induced illness

https://www.londoncp.co.uk/fab_ind_ill.html

Faith abuse

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

First Aid Policy

Healthcare Policy
Supporting children with medical conditions

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

Mental Health

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

Physical intervention

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268771/use_of_reasonable_force__advice_for_headteachers_staff_and_governing_bodies__final_july_2013_001.pdf

Private fostering

Promoting British values/Radicalisation and violent extremism

Promoting fundamental British values through SMSC - Publications - GOV.UK

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

Sexting

https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

Gender-based violence/teenage relationship abuse

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

Health and Safety Policies & Procedures

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

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