

# 1 Policy and Procedure on 2 Child Protection and Safeguarding – children’s 3 services

## 4 Brook View School

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Policy Author	Policy and Performance Team – children’s services
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## 92 1. Monitoring and review

93 1.1 The Cambian (the Proprietor) will undertake a formal annual review of this policy for the purpose of  
94 monitoring and of the efficiency with which the related duties have been discharged, by no later than one

95 year from the date shown below, or earlier if significant changes to the systems and arrangements take  
96 place, or if legislation, regulatory requirements or best practice guidelines so require.

97 1.2 The local content of this policy will be subject to continuous monitoring, refinement and audit by the Head  
98 of Service.

99  
100 Signed:



Jeremy Wiles  
Group Executive Director- Children's Services  
Date: August 2021



Sarah Chatterton  
Headteacher  
Date: November 2021

101

## 102 2. Terminology

103 2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as  
104 follows:

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<b>'Establishment' or 'Location'</b>	This is a generic term which means the Children's Home/school/college.
<b>Individual</b>	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Brook View School we have <b>Children residing at and attending</b> our <b>school</b> , between the ages of <b>8 to 19</b> .
<b>Head of Service</b>	This is the senior person with overall responsibility for the <b>school and home</b> . At Brook View School this is <b>Head</b> , Sarah Chatterton.
<b>Key Worker</b>	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
<b>Parent, Carer, Guardian</b>	Means parent or person with Parental Responsibility
<b>Regulatory Authority</b>	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
<b>Social Worker</b>	This means the worker allocated to the individual's family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
<b>Safeguarding Authority</b>	Children's Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England, Regional Safeguarding Children's Boards [RSCB] – Wales *whichever apply for the type of service and country
<b>LADO</b>	Local Authority Designated Officer
<b>DSL/DSL Deputy</b>	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
<b>Placing Authority</b>	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
<b>Staff</b>	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
<b>CambianKPI</b>	The online in-house information system which holds data for each site on quality measures.

112

### 113 3. Definitions and age related arrangements

114 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies  
 115 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2021)  
 116 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)  
 117 Act 2021.

118 3.2. **Adults are over the age of 18.** Over 18 year olds are covered by the Local Safeguarding Adult Boards  
 119 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse  
 120 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and  
 121 as a result of their particular care and support needs, is unable to protect themselves from either the risk  
 122 of, or the experience of abuse or neglect'. We refer to adult service users in our provision as **young adults**  
 123 due to the fact we provide children's services up to the age of 25.

124 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the  
 125 legal framework for social service provision in Wales. It sets out what must and should be done to

126 safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and  
127 ensure the effectiveness of work to protect and promote the welfare of children.

128 3.4. Staff working with young adults aged 18 and over, who receive education, care and support from our  
129 children's services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional  
130 Safeguarding Children's Boards depending on local arrangements.

131 3.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who  
132 attend a day or residential school or college – this might be 38 or 52 weeks' provision. Some children  
133 attending school or college live in children's homes or care homes across England and Wales, hence the  
134 reason why this policy and procedure is more comprehensive than that of a traditional day school or  
135 college. Our safeguarding responsibility extends beyond day education and often covers 24hrs services  
136 regulated by various regulators across the UK.

137 3.6. Where we make references to schools and colleges, this also includes associated children's or care homes  
138 in which children/young people live. Where we make references to children's or care homes, those cover  
139 all children's/care homes including those within the children's residential care division.  
140

### 1 Multi agency working – Safeguarding Partners & Children's Social Care

142 1.1. Children Social Care - provide support to children in need of help and protection, including children with  
143 disabilities. Services include statutory assessment and care planning for children at risk of significant  
144 harm, provision for cared for children and care experienced young people, as well as fostering and  
145 adoption services.

146 3.7. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing  
147 bodies and proprietors should ensure that the school or college contributes to multi-agency working in  
148 line with statutory guidance [Working Together to Safeguard Children](#).

149 3.8. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area  
150 within the local authority and the chief officer of police for an area (any part of which falls) within the  
151 local authority area made arrangements to work together with appropriate relevant agencies to  
152 safeguard and promote the welfare of local children, including identifying and responding to their needs.

153 3.9. It is especially important that schools and colleges understand their role in the three safeguarding partner  
154 arrangements. Governing bodies, proprietors and their senior leadership teams, especially their DSLs,  
155 should make themselves aware of and follow their local arrangements.

156 3.10. The three safeguarding partners should make arrangements to allow all schools and colleges in the local  
157 area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally,  
158 the three safeguarding partners will name schools and colleges as relevant agencies and will reach their

159 own conclusions on the best way to achieve the active engagement with individual institutions in a  
160 meaningful way.

### 161 Child protection definition

162 3.11. Child protection is part of the safeguarding process. It focuses on protecting individual children identified  
163 as suffering or likely to suffer significant harm. This includes child protection procedures which detail how  
164 to respond to concerns about a child.

### 165 Safeguarding definition – Working together to safeguard children 2018

166 3.12. **Safeguarding children and young people** is the action that is taken to promote the welfare of children  
167 and protect them from harm. It means:

- 168 • Protecting children from abuse and maltreatment,
- 169 • Preventing harm to children’s health or development,
- 170 • Ensuring children grow up with the provision of safe and effective care,
- 171 • Taking action to enable all children and young people to have the best outcomes.

### 172 Safeguarding definition – Keeping Children Safe in Education 2021

173 3.13. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes  
174 into contact with children and their families has a role to play. In order to fulfil this responsibility  
175 effectively, all practitioners should make sure their approach is child-centred. This means that they should  
176 consider, at all times, what is in the best interests of the child.

177 3.14. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 178 • Protecting children from maltreatment,
- 179 • Preventing impairment of children’s mental and physical health or development,
- 180 • Ensuring that children grow up in circumstances consistent with the provision of safe and effective  
181 care, and
- 182 • Taking action to enable all children to have the best outcomes.

### 183 Safeguarding Adults

184 3.15. Safeguarding Adults means protecting an adult’s right to live in safety, free from abuse and neglect.  
185 It is about people and organisations working together to prevent and stop both the risks and experience of abuse  
186 or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where  
187 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

188 3.16. The statutory guidance enshrines the **six principles** of adults safeguarding:

- 189
- 190 • Empowerment - presumption of person led decisions and informed consent
- 191 • Prevention - it is better to take action before harm occurs
- 192 • Proportionality - proportionate and least intrusive response appropriate to the risk presented
- 193 • Protection - support and representation for those in greatest need
- 194 • Partnerships - local solutions through services working with their communities
- 195 • Accountability - accountability and transparency in delivering safeguarding

196 3.17. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and  
197 procedures which apply to its Adults’ Services. Both policies can be accessed via Rezume. Services  
198 operating in Wales can find their Safeguarding Regional Boards via this hyperlink which provides access  
199 to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

### 200 The difference between safeguarding and child protection

201 3.18. In relation to children’s services - in practice safeguarding is the policies and practices that  
202 schools/colleges/children’s homes employ to keep children safe and promote their well-being. This

203 means everything from security of the buildings, to the safe recruitment of staff and everything in  
204 between. **Appendix 10.** Illustrates Safeguarding in children’s services.

## 205 Abuse and neglect – child and young person context

206 3.19. In the context of a child/young person abuse and neglect are forms of maltreatment. Somebody may  
207 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.  
208 Children/young people may be abused in a family or in an institutional or community setting, by those  
209 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another  
210 child/young person or children/young people.

211 3.20. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of these.  
212 The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse - children.** The  
213 signs that someone could be a victim or an abuser have been explored **in Appendix 6 and Appendix 7.**  
214 Parents, carers and other people can harm children and young people by direct acts and/or failure to  
215 provide proper care. It should also be understood that children can also be abused by being sexually  
216 exploited, or subject to honour based abuse, domestic violence, forced marriage, female genital  
217 mutilation and through online social media. See **Appendix 11 - Further safeguarding information – what**  
218 **everyone need to know.**

219 3.21. In the context of an adult, abuse is a violation of a person’s human and civil rights by another person or  
220 persons and may result in significant harm to, or the exploitation of, the person subjected to it.

221 3.22. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children,** there are other  
222 forms of abuse in relation to adults explained in more detail in **Appendix 5 – Types of abuse – Adults.**

223 3.23. Abuse can happen anywhere: for example, in someone’s own home, in a public place, in hospital, in a  
224 care home, school or in a college. It can happen when someone lives alone or with others. Anyone can  
225 carry out abuse or neglect. Abuse can be intentional or unintentional, it may be a single act or repeated  
226 acts.

## 227 4. Purpose

228 4.1. As an organisation we have a clear set of guidelines to make sure we deal with child protection and  
229 safeguarding concerns effectively.

230 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance,** and it complies  
231 with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information**  
232 **Poster.** This policy complies with **Local Authority (Lancashire)** locally agreed procedures. Printed or  
233 electronic copies of the Local Safeguarding Children’s Partnerships (LSCP), Local Safeguarding Adults

- 234 Board (LSAB) or Regional Safeguarding Children’s Boards (Wales) procedures are available in every  
235 setting.
- 236 4.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with  
237 the requirements of the local authority in which the establishment is situated.
- 238 4.4. This policy, and supporting information in various accessible forms, is made available to all Individuals,  
239 staff and parents associated with Cambian **Brook View School** to ensure that everyone is clear on  
240 procedures for ensuring the protection of children and safeguarding children and young adults.
- 241 4.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11.**  
242 **Staff Code of Practice and GHR 37. Code of Conduct.**
- 243 4.6. In addition, staff should be aware of and have access to the **NSPCC whistle-blowing helpline number**  
244 **0800 028 0285** and the Cambian Whistleblowing service operated by **EthicsPoint on 0800 086 9128**. More  
245 information about EthicsPoint and how it can be contacted can be found in the Whistleblowing policy.
- 246 4.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to support  
247 school and college staff with when it is appropriate to contact the police.
- 248 4.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer  
249 from harm, it is important that a referral to children’s social care (and if appropriate the police) is made  
250 immediately. Referrals should follow the local referral process.

## 251 5. Policy

### 252 Safeguarding culture of the organisation

- 253 5.1. Cambian safeguarding culture can be best described as:
- 254 - **Proactive**, being professionally curious to determine further information in the interests of the child.  
255 It is essential that staff exercise professional curiosity at all times as it is likely that signs of any form  
256 of abuse including neglect will be identified when dealing with an un-associated incident. Having



- 257 strong governance and leadership, raising awareness through and enhancing children’s and young  
258 people’s capacity around the risks and their own safety, regular reflective supervision).
- 259 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other professionals  
260 in timely manner, active listening, applying theory in practice in a methodical way).
- 261 - **Reflective** (understanding ‘how we got there in the first place’, completing a reflective account of  
262 events, involving other key professionals in future planning, identifying actions and further changes  
263 to be made.
- 264 5.2. Child Protection and Safeguarding is everyone’s responsibility. Everyone working for or visiting our  
265 locations has a responsibility to understand and implement this policy and procedure at all times.
- 266 5.3. All Individuals in our services have a right to feel safe, secure and be protected from harm.
- 267 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all  
268 Individuals with Special Educational Needs (SEN) and disabilities:
- 269 • Are more likely to be abused or neglected;
  - 270 • May display behaviour, mood and/or injury which may relate to possible abuse and not just their SEN  
271 or a particular disability.
  - 272 • Have a higher risk of peer group isolation.
  - 273 • Can be disproportionately impacted by things like bullying without outwardly showing any signs.
  - 274 • Experience communication barriers and difficulties in overcoming these barriers.
- 275 5.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.  
276 We will ensure all staff have the skills, knowledge and understanding to help keep children and young  
277 people safe.
- 278 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or  
279 disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care home  
280 or in the community, taking into account contextual safeguarding, see **Appendix 11 - Further**  
281 **safeguarding information – what everyone need to know** which also contains information related to  
282 safeguarding issues related to individual children and young people’s needs.
- 283 5.7. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding  
284 of safeguarding, through both formal curriculum and informal opportunities.
- 285 5.8. As an organisation we acknowledge that working in partnership with other agencies protects Individuals  
286 and reduces risk and so we will engage in partnership, working throughout the child protection process  
287 to safeguard children and will equally work through safeguarding adults’ procedures as directed by local  
288 procedures.
- 289 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance  
290 referred to in this document can be found in separate appendices at the end of this document.

## 2Divisional Safeguarding Board

- 292 5.10. As an organisation Caretech children’s services operates 3 Divisional Safeguarding Boards: Education,  
293 Residential Care and Fostering. The main purpose of each board is to ensure that all services across  
294 all divisions discharge their responsibilities effectively for assuring safe and secure services for  
295 children and young people, and manage all safeguarding risks appropriately within its own workforce,  
296 including direct employees and also the contracted workforce (supply workers/agency/contractor and  
297 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

## 2What staff should read and be aware of

- 299 5.11. KCSIE2021 guidance replaces Keeping Children Safe in Education 2020 updated in January 2021. The  
300 changes will come into force from September 2021. The statutory guidance should be read and followed

- 301 by the Proprietor(s) of independent schools and non-maintained special schools and colleges. In both  
302 instances this includes including Senior Leadership Teams.
- 303 5.12. All staff in Caretech/Cambian schools and colleges must read at least [Part one of KCSIE2021](#) guidance  
304 and school/colleges should have a record to confirm this has been completed prior to 1<sup>st</sup> September 2021.
- 305 5.13. HTs / Principals and DSL (or a deputy) should read the [whole KCSIE2021 Guidance](#).
- 306 5.14. The guidance also suggests that Governors and Proprietor should read [Annex A](#) which is a condensed  
307 version of Part one: 'Annex A can be provided (instead of Part one) to those staff who do not directly  
308 work with children, if the governing body or proprietor think it will provide a better basis for those staff  
309 to promote the welfare and safeguard children'. The Organisation maintains that all staff including those  
310 supporting the school/college with frequent or less frequent visits to the site read at **least Part One** so all  
311 staff understand their safeguarding responsibilities.
- 312 5.16 The guidance should be read alongside:
- 313 • statutory guidance - [Working Together to Safeguard Children](#)
- 314 • departmental advice - [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#)  
315 ; and;
- 316 • [Part 5 of KCSIE2021](#) should be read alongside the departmental advice - [Sexual violence and sexual](#)  
317 [harassment between children in schools and colleges](#) which contains further details on: what sexual  
318 violence and sexual harassment constitutes, important context to be aware of, including; what is  
319 consent, power imbalances, and developmental stages, harmful sexual behaviour (HSB), including  
320 that a child displaying HSB may be an indication that they are a victim of abuse themselves, related  
321 legal responsibilities for schools and colleges, advice on a whole school or college approach to  
322 preventing child on child sexual violence and sexual harassment, and more detailed advice on  
323 responding to reports of sexual violence and sexual harassment, including safeguarding and  
324 supporting both the victim(s) and alleged perpetrator(s).
- 325 5.15. In July 2021 DSL (or a deputy) within Education division, Heads/Principals, Representative from Children's  
326 residential care (Senior Managers), Representatives from Business Support Functions and Directors  
327 attended KCSiE2021 webinar provided by the Safeguarding Network. Following the webinar, recording of  
328 session and the additional learning resources have been shared with the participants to support  
329 dissemination to their teams.
- 330 5.16. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how  
331 the learning will take place with their staff, organise KCSiE2021 knowledge check (via Safeguarding  
332 Network) and ensure that the record of completed knowledge check is stored on MYRUS - the  
333 Organisation's Learning and Development platform .
- 334 5.17. The Heads/Principals and DSL should ensure that mechanisms are in place to assist staff to understand  
335 and discharge their role and responsibilities as set out in Part one of KCSIE2021 guidance. Schools and

336 colleges and their staff are an important part of the wider safeguarding system for children. This system  
337 is described in the statutory guidance [Working Together to Safeguard Children](#).

338 5.18. All staff should be aware of systems within their school or college which support safeguarding and these  
339 should be explained to them as part of staff induction. This should include the:

340 - Child protection and safeguarding policy

341 - Behaviour Support policy

342 - Anti bullying policy

343 - Whistleblowing policy, Code of conduct and Code of Practice policy

344 - Missing from Care policy, local procedure for children missing from education

345 - Role of the DSL (including the identity of the DSL and any deputies)

346 - Have Access to policies and a copy of Part one of KCSIE2021

347 - All staff should be aware of their local early help process and understand their role in it, more  
348 information can be found in [Working Together to Safeguard Children 2018](#)  
349 ([publishing.service.gov.uk](#)).

350 5.19. All staff should be aware of the process for making referrals to children's social care and for statutory  
351 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child  
352 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might  
353 be expected to play in such assessments.

354 5.20. Schools concerned about a child's welfare should refer their concern to local authority children's social  
355 care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's  
356 social care (and if appropriate the police) is made immediately. Referrals should follow the local referral  
357 process. Children's homes/care homes should follow their referral process as per their local procedure  
358 and contact Safeguarding Partner/Safeguarding Board as per their local Safeguarding procedure.

359 5.21. All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff  
360 should know how to manage the requirement to maintain an appropriate level of confidentiality. This  
361 means only involving those who need to be involved, such as the DSL (or a deputy) and children's social  
362 care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse,  
363 as this may ultimately not be in the best interests of the child.

364 5.22. Staff should **not** assume a colleague, or another professional will take action and share information that  
365 might be critical in keeping children safe. They should be mindful that early information sharing is vital  
366 for the effective identification, assessment, and allocation of appropriate service provision, whether this  
367 is when problems first emerge, or where a child is already known to local authority children's social care  
368 (such as a child in need or a child with a protection plan).

### 369 **Whole service approach to Safeguarding**

370 5.23. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or  
371 college approach to safeguarding. This means ensuring safeguarding and child protection are at the  
372 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,  
373 processes and policies should operate with the best interests of the child at their heart.

374 5.24. Where there is a safeguarding concern, the proprietor and service leaders should ensure the child's  
375 wishes and feelings are taken into account when determining what action to take and what services to  
376 provide. Systems should be in place, and they should be well promoted, easily understood and easily

377 accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and  
378 knowing they can safely express their views and give feedback.

### 379 **Children with special educational needs and disabilities or physical health issues**

380 5.25. Children with special educational needs or disabilities (SEND) or certain health conditions can face  
381 additional safeguarding challenges. There might be some additional barriers when recognising abuse and  
382 neglect in this group of children. These can include:

- 383 • assumptions that indicators of possible abuse such as behaviour, mood and injury relate to  
384 the child's/young person's condition without further exploration;
- 385 • these children/young people being more prone to peer group isolation or bullying  
386 (including prejudice-based bullying) than other children/young people;
- 387 • the potential for children/young people with SEND or certain medical conditions being  
388 disproportionately impacted by behaviours such as bullying, without outwardly showing any  
389 signs; and
- 390 • Communication barriers and difficulties in managing or reporting these challenges.

391 5.26. SEN division and other services where children have/may have SEND should consider extra pastoral  
392 support and attention for these children, along with ensuring any appropriate support for communication  
393 is in place. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and](#)  
394 [Supporting Pupils at School with Medical Conditions](#).

## 395 **6. Procedure**

### 396 **Roles and responsibilities**

397 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**  
398 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and  
399 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

400 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors,  
401 partner organisations and visitors are aware of the policy and are supported to implement and work in  
402 accordance with it, as well as creating a management culture that encourages a focus on safeguarding.

403 They must ensure that they are responsive, acting immediately if they become aware of any safeguarding  
404 concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

405 6.3. The **DSL** is responsible for handling reports and/or concerns, about the protection of children, young  
406 people and adults, appropriately and in accordance with the procedures that underpin this policy.  
407  
408



409

410 6.4. **Our DSL** is **Sarah Chatterton** who is a senior member of our leadership team. The role of the DSL is to:

- 411
- 412 • Ensure this child protection and safeguarding policy and local arrangements are known, understood  
413 and used appropriately by the staff.
  - 414 • Act as a source of support, advice and expertise for all staff, provide support to staff to carry out their  
415 safeguarding duties.
  - 416 • Act as a point of contact with the Safeguarding Authority.
  - 417 • Take lead responsibility for referring and managing safeguarding issues and cases, unless  
418 management of a particular case is passed on to a more senior member of the organisation – see  
419 section of allegations (those meeting harm threshold and those which don't meet LADO criteria).
  - 420 • Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior  
421 mental health leads and special educational needs coordinators (SENCOs) or the named person with  
oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding

- 422 and welfare (including online and digital safety) and when deciding whether to make a referral by  
423 liaising with relevant agencies so that children’s needs are considered holistically.
- 424 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,  
425 where safeguarding concerns are linked to mental health.
- 426 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child  
427 or adult) and where appropriate - Local Authority Designated Officer (LADO).
- 428 • Liaise with the head teacher or principal (if they are not the DSL themselves) to inform him or her of  
429 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police  
430 investigations.
- 431 • As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for  
432 child protection concerns in cases which concern a staff member.
- 433 • Refer cases to the Channel programme where there is a radicalisation concern as required.
- 434 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the  
435 Disclosure and Barring Service as required; and
- 436 • Refer cases where a crime may have been committed to the Police as required.
- 437 • Act as a source of advice, support and expertise within the location when deciding to make a referral  
438 by liaising with relevant agencies.
- 439 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and  
440 child protection issues that children are experiencing, or have experienced, with teachers and school  
441 and college leadership staff.
- 442 • Identify staff safeguarding training needs and organise training for their staff.
- 443 • Participate in local safeguarding boards when required.
- 444 • Evaluate and contribute to high standards of safeguarding practice at the location.
- 445 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are  
446 guarded from harm or abuse.
- 447 • Ensure the child protection and safeguarding policy is available publicly and parents/those with  
448 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be  
449 made and the role of the school/college/home in this.
- 450 • Understands the relevant data protection legislation and regulations, especially The Data Protection  
451 Act 2018.
- 452 6.5. More details about the role of the DSL including their availability, management of referrals, information  
453 sharing, working with others, raising awareness and other can be found in [KCSIE 2021 Annex C – Role of  
454 the DSL](#).
- 455 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where  
456 asked do to so. There are arrangements for covering the role of the DSL when **Sarah Chatterton** is

457 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team  
 458 lead by a DSL with a number of deputies where required. Our Designated Deputies are:  
 459

	
Name: Gemma Armer	Name: Andrea Walker
Contact: 07795 830713	Contact: 01254 958579

460

461 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected  
 462 abuse and neglect should be given the highest priority.

463 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and**  
 464 **Safeguarding at Cambian.**

465 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure** , which sets out clear steps  
 466 to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff  
 467 must use the correct forms when recording and managing concerns and allegations regarding the abuse  
 468 of individuals. Education services must use Behaviour Watch system: Concern/Safeguarding function to  
 469 record concerns. Where, throughout this policy, references are made to the ‘concern form’ this means  
 470 either **25.04 Concern form** which is a word document (part of this policy) or the Behaviour Watch –  
 471 Concern/Safeguarding functionality where the system is being used.

**Information sharing and managing the child protection file**

473 6.10. **The DSL** is responsible for ensuring that child protection files are kept up to date. Information should be  
 474 kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child  
 475 protection file for each child. Schools and colleges should use the Behaviour Watch system -  
 476 Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs per  
 477 child/young person as necessary.

478 6.11. Records should include:

- 479 • a clear and comprehensive summary of the concern;
- 480 • details of how the concern was followed up and resolved;
- 481 • a note of any action taken, decisions reached and the outcome

482 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content  
 483 within it is shared, this happens in line with information sharing advice as set out in Part one of KCSIE2021.  
 484 Schools and colleges using Behaviour Watch must set up their system Group purposes in line with  
 485 Behaviour Watch guidance. Behaviour Watch ‘Safeguarding Group’ controls who can view and report on  
 486 Concern/SG slips and ‘Not Safeguarding Group’ is an opposite Group to restrict who can complete certain  
 487 sections within the Concern/SG slips.

488 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**  
 489 **each pupil or student.** This goes beyond the legal minimum. It is good practice to give the school or

490 college additional options to make contact with a responsible adult when a child missing education is also  
491 identified as a welfare and/or safeguarding concern.

#### 492 **LADO referral criteria (KCSIE2021) – meeting the harm threshold**

493 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if they  
494 continue to work in regular or close contact with children in their present position, or in any capacity with  
495 children in a school or college. This guidance should be followed where it is alleged that anyone working  
496 in the school or college that provides education for children under 18 years of age, including supply  
497 teachers and volunteers has:

- 498 • A person(s) behaved in a way that has harmed a child, or may have harmed a child, and/or,
- 499 • A person(s) possibly committed a criminal offence against or related to a child, and/or,
- 500 • A person(s) behaved towards a child or children in a way that indicates he or she may pose a risk of  
501 harm to children; and/or,
- 502 • A person(s) behaved or may have behaved in a way that indicates they may not be suitable to work  
503 with children

504 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the](#)  
505 [Children Act 1989 as amended by the Adoption and Children Act 2002](#).

506 6.16. The last bullet point above includes behaviour that may have happened outside of school or college that  
507 might make an individual unsuitable to work with children, this is known as transferable risk. Where  
508 appropriate an assessment of transferable risk to children with whom the person works should be  
509 undertaken. If in doubt seek advice from the local authority designated officer (LADO).

510 6.17. This above information relate to members of staff, supply staff and volunteers who are currently working  
511 in any school or college regardless of whether the school or college is where the alleged abuse took place.  
512 Allegations against a teacher who is no longer teaching should be referred to the police. Historical  
513 allegations of abuse should also be referred to the police.

#### 514 **Children potentially at greater risk of harm**

515 6.18. Many children and young people in our services (Education and care) organisation have an allocated  
516 social worker due to safeguarding or welfare needs.

517 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's  
518 experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally  
519 disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

520 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this  
521 information so that decisions can be made in the best interests of the child's safety, welfare and  
522 educational outcomes. This should be considered as a matter of routine. There are clear powers to share  
523 this information under existing duties on both local authorities and schools and colleges to safeguard and  
524 promote the welfare of children.

525 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,  
526 responding to unauthorised absence or missing education where there are known safeguarding risks) and  
527 about promoting welfare (for example, considering the provision of pastoral and/or academic support,  
528 alongside action by statutory services). Schools/colleges must follow missing from education protocol  
529 agreed with their LA.

#### 530 **Unexplained body marks**

531 6.22. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,  
532 swellings, cuts and scratches which by and large will be as a result of daily activities or for some Individuals  
533 as a result of self-injurious behaviour. However, all marks or physical changes must be recorded  
534 appropriately using (number to be added) weekly body chart. A Concern form must be completed for all  
535 unexplained marks and physical changes and passed to the DSL (or a deputy) along with copies of the last



536 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always be kept  
537 informed. Concern log should be updated with concern and relevant reference number provided to  
538 concern.

539 6.23. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the  
540 correct course of action for dealing with unexplained body marks.

541 6.24. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no  
542 reasonable explanation can be given the DSL must contact the Safeguarding Authority/LADO for further  
543 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

544 6.25. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be  
545 opened and safeguarding process followed.

546 6.26. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome  
547 must be shared with social worker and parents.

#### 548 **Disclosure from an Individual**

549 6.27. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**  
550 **procedure.**

551 6.28. It is important to note that children/young people may not find it easy to tell staff about their abuse  
552 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react  
553 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a  
554 member of school or college staff may overhear a conversation that suggests a child has been harmed or  
555 a child's/young person's own behaviour might indicate that something is wrong. If staff have any  
556 concerns about a child's/young person's welfare, they should act on them immediately rather than wait  
557 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**  
558 **procedure.**

559 6.29. In case of reports of sexual violence and sexual harassment between children and young people, these  
560 are extremely complex to manage. It is essential that victims are protected, offered appropriate support  
561 and every effort is made to ensure their education and care is not disrupted. It is also important that  
562 other children, young people and staff are supported and protected as appropriate.

563 6.30. The service's initial response to a report from a child is incredibly important. How the staff respond to a  
564 report can encourage or undermine the confidence of future victims of sexual violence and sexual  
565 harassment to report or come forward.

566 6.31. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.  
567 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage  
568 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding  
569 Authority) to discuss next steps. Staff should only share the report with those people who are necessary  
570 in order to progress it. It is important that the victim understands what the next steps will be and who  
571 the report will be passed to.

572 6.32. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how  
573 the report will be progressed, don't ask leading questions and only prompt the child where necessary  
574 with open questions – where, when, what, etc. It is important to note that whilst leading questions should  
575 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

576 6.33. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or  
577 college staff. It is important that the person to whom the child discloses recognises that the child has  
578 placed them in a position of trust. They should be supportive and respectful of the child.

579 6.34. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report  
580 and immediately write up a thorough summary. This allows the staff member to devote their full  
581 attention to the child and to listen to what they are saying. It may be appropriate to make notes during  
582 the report (especially if a second member of staff is present). However, if making notes, staff should be  
583 conscious of the need to remain engaged with the child and not appear distracted by the note taking.

584 Either way, it is essential a written record is made using Concern form which is part of this policy. The  
585 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report  
586 to the DSL must be completed within an hour from the moment of the disclosure being made.

587 6.35. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of  
588 the note taker. Staff should be aware that notes of such reports could become part of a statutory  
589 assessment by Safeguarding Authority and/or part of a criminal investigation.

590 6.36. In cases where either a child/young person informs the staff that an act of FGM – however described –  
591 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that  
592 an act of FGM has been carried out these situations, the DSL must be informed, who will trigger child  
593 protection/safeguarding procedures described in this policy and contact the Police. If a child/young  
594 person is at immediate risk – the Police (999) must be contacted immediately. If a child/young person  
595 required medical attention follow steps identified in 'Setting priorities' section below.

596 6.37. Remember, **do not**:

- 597 • Investigate the incident
- 598 • Ask leading questions
- 599 • Get the young person to repeat the disclosure over and over
- 600 • Make assumptions or offer alternative explanations
- 601 • Approach/inform the alleged abuser

602 6.38. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**  
603 **and recording procedure.**

604 6.39. All staff know that they can contact the Local Authority direct should that be necessary. Where a  
605 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding  
606 Adult Board. Where someone is over 18 but still receiving children's services, the matter should be dealt  
607 with by the local Safeguarding Adult Board.

608 6.40. For allegation made against a staff member or senior managers/directors follow relevant allegations  
609 procedures described later on in this policy.

610 6.41. Where contact is made with the Local Authority in which **Cambian Brook View School** is geographically  
611 located, contact will also be made with the individual's own Local Authority and also the child/young  
612 person's social worker. This will be completed by one of the members of the school/college/home's  
613 safeguarding team.

614 6.42. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be  
615 informed immediately and they can take immediate protective action as necessary.

616 6.43. If a member of staff feels their concerns are not being taken seriously then they are to inform a more  
617 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding  
618 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128.**

## 6 Risk Assessment

620 6.44. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk  
621 and needs assessment. Where there has been a report of sexual harassment, the need for a risk

622 assessment should be considered on a case-by-case basis. The risk and needs assessment should  
623 consider:

- 624 • the victim, especially their protection and support,
- 625 • whether there may have been other victims,
- 626 • the alleged perpetrator(s); and
- 627 • all the other children, (and, if appropriate, adult students and staff) at the school or college  
628 especially, and any actions that are appropriate to protect them from the alleged  
629 perpetrator(s), or from future harms.

630 6.45. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times,  
631 staff should be actively considering the risks posed to all their pupils and students and put adequate  
632 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are  
633 engaging with Safeguarding Authority and specialist services as required. Where there has been a report  
634 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence  
635 specialists will be required. The above school or college risk assessment is not intended to replace the  
636 detailed assessments of expert professionals. Any such professional assessments should be used to  
637 inform the school's or college's approach to supporting and protecting their pupils and students and  
638 updating their own risk assessment.

#### 639 Following a report - what to consider

640 6.46. Important considerations will include:

- 641 • the wishes of the victim in terms of how they want to proceed. This is especially important in  
642 the context of sexual violence and sexual harassment. Victims should be given as much control  
643 as is reasonably possible over decisions regarding how any investigation will be progressed and  
644 any support that they will be offered. This will however need to be balanced with the school's  
645 or college's duty and responsibilities to protect other children;
- 646 • the nature of the alleged incident(s), including whether a crime may have been committed  
647 and/or whether HSB has been displayed;
- 648 • the ages of the children involved;
- 649 • the developmental stages of the children involved;
- 650 • any power imbalance between the children. For example, is the alleged perpetrator(s)  
651 significantly older, more mature or more confident? Does the victim have a disability or  
652 learning difficulty?
- 653 • if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be  
654 accompanied by other forms of abuse and a sustained pattern may not just be of a sexual  
655 nature);
- 656 • that sexual violence and sexual harassment can take place within intimate personal  
657 relationships between peers;
- 658 • are there ongoing risks to the victim, other children, adult students or school or college  
659 staff; and
- 660 • other related issues and wider context, including any links to child sexual exploitation and  
661 child criminal exploitation.

662 6.47. As always when concerned about the welfare of a child, all staff should act in the best interests of the  
663 child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout

664 this guidance. Immediate consideration should be given as to how best to support and protect the victim  
665 and the alleged perpetrator(s) (and any other children involved/impacted).

#### 666 Options to manage the report

667 6.48. It is important that schools and colleges consider every report on a case-by-case basis. When to inform  
668 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going  
669 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college  
670 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be  
671 informed of the allegations. However, as per general safeguarding principles, this does not and should  
672 not stop the school or college taking immediate action to safeguard their children, where required.

673 6.49. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual  
674 violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are  
675 regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly  
676 important to look out for potential patterns of concerning, problematic or inappropriate behaviour.  
677 Where a pattern is identified, the school or college should decide on a course of action. Consideration  
678 should be given as to whether there are wider cultural issues within the school or college that enabled  
679 the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training  
680 could be delivered to minimise the risk of it happening again. The four scenarios are:

681 • **Manage internally;** In some cases of sexual harassment, for example, one-off incidents,  
682 the school or college may take the view that the children concerned are not in need of early  
683 help or that referrals need to be made to statutory services and that it would be  
684 appropriate to handle the incident internally, perhaps through utilising their behaviour  
685 policy and by providing pastoral support.

686 • **Early help:** In line with the above, the school or college may decide that the children  
687 involved do not require referral to statutory services but may benefit from early help. Early  
688 help means providing support as soon as a problem emerges, at any point in a child's life.  
689 Providing early help is more effective in promoting the welfare of children than reacting  
690 later. Early help can be particularly useful to address non-violent HSB and may prevent  
691 escalation of sexual violence. It is particularly important that the DSL (and their deputies)  
692 know what the Early Help process is and how and where to access support.

693 • **Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm,  
694 or is in immediate danger, schools and colleges should make a referral to the local  
695 Safeguarding Authority. At the point of referral, schools and colleges will generally inform  
696 parents or carers, unless there are compelling reasons not to (if informing a parent or  
697 carer is going to put the child at additional risk). Any such decision should be made with  
698 the support of children's social care.

699 • **Reporting to the Police** - any report to the police will generally be in parallel with a referral  
700 to children's social care (as above. It is important that the DSL and their deputies) are clear  
701 about the local process for referrals and follow that process.

702 6.50. More information about the four areas listed above, considering bail conditions, managing any delays in  
703 the criminal process and the end of criminal process can be found in [KCSIE2021 Part 5 para 452.](#)

#### 704 Unsubstantiated, unfounded, false or malicious reports

705 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider  
706 whether the child and/or the person who has made the allegation is in need of help or may have been

707 abused by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding  
708 authority may be appropriate.

709 6.52. If a report is shown to be deliberately invented or malicious, the school or college, should consider  
710 whether any disciplinary action is appropriate against the individual who made it as per their own  
711 behaviour policy.

### 7 Safeguarding and supporting the victim

713 6.53. The needs and wishes of the victim should be paramount (along with protecting the child) in any  
714 response. It is important they feel in as much control of the process as is reasonably possible. Wherever  
715 possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority  
716 should be to make the victim's daily experience as normal as possible, so that the school or college is a  
717 safe space for them.

718 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the  
719 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual  
720 violence and sexual harassment, a power imbalance is likely to have been created between the victim  
721 and alleged perpetrator(s).

722 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel  
723 ashamed for making a report. This has been made clear throughout this policy and procedure.

724 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The  
725 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different  
726 from that for a report of rape.

727 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,  
728 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a  
729 health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault  
730 Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors  
731 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children  
732 and adults, regardless of when the incident occurred.

733 6.58. More information about Early help, Children and young people's Independent Sexual Violence Advisors  
734 and ChISVAs services (where available), CAMHS and other can be found in [KCSIE 2021 Part 5 para 456](#).

### 7 Safeguarding and supporting the alleged perpetrator(s)

736 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice:  
737 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles  
738 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding  
739 and supporting the alleged perpetrator(s):

740 • The school or college will have a difficult balancing act to consider. On the one hand, they  
741 need to safeguard the victim (and the wider pupil/student body) and on the other hand  
742 provide the alleged perpetrator(s) with an education, safeguarding support as appropriate  
743 and implement any disciplinary sanctions. Taking disciplinary action and still providing  
744 appropriate support are not mutually exclusive actions. They can, and should, occur at the  
745 same time if necessary.

746 • Consider the age and the developmental stage of the alleged perpetrator(s), the nature of  
747 the allegations and frequency of allegations. Any child will likely experience stress as a  
748 result of being the subject of allegations and/or negative reactions by their peers to the  
749 allegations against them.

750 • Consider the proportionality of the response. Support (and sanctions) should be  
751 considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet  
752 needs (in some cases these may be considerable) as well as potentially posing a risk of harm

753 to other children. HSB in young children may be (and often are) a symptom of either  
754 their own abuse or exposure to abusive practices and or materials.

755 • It is important that the perpetrator(s) is/are also given the correct support to try to stop  
756 them re-offending and to address any underlying trauma that may be causing this  
757 behaviour. Addressing inappropriate behaviour can be an important intervention that  
758 helps prevent problematic, abusive and/or violent behaviour in the future.

759 • Advice on behaviour and discipline in schools is clear that teachers can discipline pupils  
760 whose conduct falls below the standard which could be reasonably expected of them. If  
761 the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

762 6.60. More information in relation to this section can be found in [KCSIE 2021 Part 5 para 464.](#)

### 763 **Setting priorities**

764 6.61. The priority, at all stages throughout the child protection or safeguarding process, is the interests and  
765 safety of the individual.

766 6.62. Where appropriate, any concerns will be discussed with the Individual's family / carers and where  
767 possible their agreement will be sought to making a referral to the Local Authority. However, where  
768 there is a conflict of interests between the Individual and parent/guardian, the interests of the Individual  
769 must take priority and **Cambian Brook View School** reserves the right to contact the Individual's local  
770 authority, Social Care or the Police, without notifying parents/carers if this is in their best interests.

771 6.63. If an urgent medical attention or advice is required and GP/speciality doctor is not available, staff MUST  
772 use the NHS **111** service. NHS **111** is available 24 hours a day, 7 days a week.

773 6.64. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance.  
774 Alternatively, if it's assessed to be in the best interest of the child/young person - the DSL MUST take the  
775 Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local  
776 Authority/Police, remembering that every reasonable effort should be made to inform the parents/carers  
777 as soon as possible.

778 6.65. If the suspected abuse is sexual, then the medical professional must determine if the medical examination  
779 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility  
780 that the needs of the young person are such that medical attention is the priority, in such case medical  
781 professional's judgment must be followed. There must at all times be an Appropriate adult (parent  
782 guardian or a social worker) with the individual whether from the Individual's care home/school/college,  
783 the Local Authority or the Police, if the parents/carers are not included. This section must be read in  
784 conjunction with our **0.29. Child Sexual Exploitation policy.**

785 6.66. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak for  
786 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA.  
787 Further information on MCA are available in our **0.13. Mental Capacity and Consent policy.**

### 788 **Allegation of abuse by one or more Individuals on another Individual**

789 6.67. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for  
790 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual  
791 is suffering or likely to suffer significant harm'. DSL must refer peer on peer abuse to a Safeguarding  
792 Authority, local Authority and Regulator.

### 793 **Allegation of abuse of an Individual who is not registered at our provision – staff involved**

794 6.68. If we were given information that suggested that someone who does not reside at or attends our location  
795 has been abused by one of our members of staff, the DSL would immediately report this to the Local  
796 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted.  
797 Should the staff member be involved we would then formally advise the member of staff of the allegation,  
798 making it clear that we would not play any part in the investigatory process. The employee would be  
799 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived  
800 risks) etc., in exactly the same way as if the allegation had involved an Individual at our

801 home/school/college. However, HR Business Partner must be consulted before any action is taken. If the  
802 allegation is subsequently proved to be unfounded, he or she would be given full support in resuming  
803 their career. Should we be asked by LADO/Safeguarding authority to be involved in any potential  
804 investigations or parts of it, a HR Business Partner will have to be consulted first. At this point an  
805 assessment will need to be made to identify what detail (if any) can be disclosed to a member of staff  
806 involved.

### 8 Allegation of abuse of an Individual who is not registered at our provision- third party involved

808 6.69. If we were given information that suggested that someone who does not reside at or attends our location  
809 has been abused by a third party (known or unknown to the provision), the DSL would immediately report  
810 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice  
811 provided by the leading agency and report back to the Head of Service who will explore any associated  
812 risk/s in relation to the provision.

### 8 Allegations against staff

814 6.70. All allegations must be reported to the DSL **Sarah Chatterton** or in their absence to a DSL Deputy – see  
815 your local Safeguarding poster. Also, where appropriate - HR Business Partner must be consulted.

816 6.71. When an allegation is made against a member of staff, set procedures must be followed, see the flow  
817 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

818 6.72. Staff MUST act on every allegation, all repeated allegations must be treated as new and carefully assessed  
819 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with  
820 fairly, quickly and consistently and to be kept informed of its progress.

821 6.73. Staff should refer to the **25.08.Guidance for staff who have the allegation made against them** provided  
822 for what to do in the event an allegation is made against them.

### 8 Allegations against staff in Education

824 6.74. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.  
825 KCSIE2021 splits the type of allegations into two groups:

- 826 • Allegations that may meet the harms threshold (see **LADO referral criteria (KCSIE2021) –**  
827 **meeting the harm threshold** of this policy)
- 828 • Allegation/concerns that do not meet the harms threshold – referred in the guidance and  
829 this policy as ‘low level concerns’.

830 6.75. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they  
831 continue to work in regular or close contact with children in their present position, or in any capacity with  
832 children in a school or college. The KCSiE2021 guidance should be followed where allegations are made  
833 against anyone working in the school or college that provides education for children under 18 years of  
834 age, including supply teachers and volunteers.

835 6.76. The information above relate to members of staff, supply staff, volunteers and contractors who are  
836 currently working in any school or college regardless of whether the school or college is where the alleged  
837 abuse took place. In Education allegations against people listed above should be referred to the  
838 Head/Principal who is often the DSL, however where the Head/Principal is not the DSL, allegations against  
839 staff including supply, volunteers and contractors must be referred to the Head/Principal. This is because  
840 the concern/allegation may align with other performance or personal related issues the Head/Principal  
841 might already be aware of, whereas the DSL may not be. The Principal/Head should ensure the DSL is  
842 briefed as appropriate and will then decide who the case should be led by – the DSL or themselves.  
843 Allegations against a teacher who is no longer teaching should be referred **to the police** and HR Business  
844 Partner advised.

845 6.77. Where an adult makes an allegation to a school or college that they were abused as a child, the individual  
846 should be advised to report the allegation to the police. Non recent allegations made by a child, should  
847 be reported to the LADO in line with the local authority’s procedures for dealing with non-recent

848 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no  
849 matter how long ago it happened.

850 6.78. Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher  
851 because of serious misconduct, or might have dismissed them or ceased to use their services had they  
852 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching  
853 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found  
854 on GOV.UK.

#### **8 Allegations against supply teachers and all workers supplied by agency**

856 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual not  
857 directly employed by them, where its disciplinary procedures do not fully apply because agencies will  
858 have their own policies and procedures; for example, supply teachers or contracted staff provided by an  
859 employment agency or business.

860 6.80. Whilst The Organisation's schools and colleges are not the employer of supply teachers, they should  
861 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease  
862 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the  
863 LADO to determine a suitable outcome. Schools and colleges must also consult HR Business Partner who  
864 may advise further. Governing bodies and proprietors should discuss with the supply agency or agencies  
865 where the supply teacher is working across a number of schools of colleges, whether it is appropriate to  
866 suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry  
867 out their investigation.

868 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or  
869 children's social care. The school or college will usually take the lead because agencies do not have direct  
870 access to children or other school of college staff, so they will not be able to collect the facts when an  
871 allegation is made, nor do they have all the relevant information required by the LADO as part of the  
872 referral process.

873 6.82. When using a supply agency, schools and colleges should inform the agency of its process for managing  
874 allegations but also take account of the agency's policies and investigatory process and their duty to refer  
875 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or  
876 equivalent to meetings and keeping them up to date with information about its policies. It is important  
877 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be  
878 consulted.  
879

#### **8 Allegations against the DSL (Principal or Registered Manager or DSL as a substantive role)**

881 6.83. All allegations must be reported to:

882 - Education division: Regional Education Lead **Naseem Akhtar**, unless within residential education  
883 Registered Manager is the DSL in which case the matter will be referred to the Head/ Principal. For



- 884 the DSL fulfilling the role as their substantive role, all allegations must be reported to the  
885 Principal/Head.
- 886 - Children’s residential care division: Regional Manager **Dave Phipps**, unless Regional Manager is the  
887 DSL in which case the matter will be referred to the Managing Director.
- 888 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above) will  
889 then refer the matter to **local Safeguarding Authority/LADO** and notify their line manager:
- 890 - **Education division: Regional Education Lead **Naseem Akhtar** or**
- 891 - **Managing Director for Education **Andrew Sutherland**. In Independent schools – the Proprietor must**  
892 **also be notified.**
- 893 - Children’s residential care division: Managing Director **Andrew Sutherland**.
- 894 **6.85.** The person who referred the matter to **local Safeguarding Authority/LADO** in line with agreed course of  
895 action will make a decision about who will lead the case including management investigation – should  
896 the allegation threshold be met. The appropriate HR Business Partner should be notified, so they can  
897 advise and where required - support the investigation.
- 898 6.86. In residential education associated with children’s homes/care homes the Responsible/Nominated  
899 Individual MUST also be notified.
- 900 6.87. Services using Behaviour Watch system – allegations made against the DSL or DSL Deputy who have full  
901 access to the system including Concern/Safeguarding function, should not be initially entered to the  
902 system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as they would  
903 have been prior to implementation of the Behaviour Watch. This is to ensure that no one, including those  
904 who are part of the service’s Safeguarding Team are able to see the details of their own case which could  
905 have a detrimental impact on the investigation itself and the outcome of it. However, once the case has  
906 been concluded, a decision should then be made about whether or not the detail related to the case  
907 should be retrospectively entered in to Behaviour Watch or kept in the original format. Such a decision  
908 should be made by the Case Manager, Managing Director and a member of HR Team. Should a decision  
909 be made to keep it in the original format, a Concern/SG slip in the Behaviour Watch must still be  
910 retrospectively opened and a note added to reflect that there was an allegation made against the DSL/DSL  
911 Deputy but without specifying any further detail about the character of the allegation. Instead a reference  
912 number of the case and location of the pack related to the case is provided. This action will ensure that  
913 the case has been captured in the system which will then allow the service to generate a log with accurate  
914 numbers of concerns and safeguarding cases for the service.

**9 Allegations against the Regional Manager/other Regional staff**

- 916 6.88. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
917 Head/Principal) who will make the initial referral to **local Safeguarding Authority/LADO**. Following this,  
918 the allegation should be passed to the identified senior person to follow through with **local Safeguarding**  
919 **Authority/LADO** and subsequently act in line with agreed course of action. This means that the DSL will  
920 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
921 gathering any information or, should it be required, in the actual investigation in relation to a senior  
922 member.
- 923 6.89. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to  
924 **local Safeguarding Authority/LADO** and act in line with agreed course of action.
- 925 6.90. The appropriate HR Business Partner should be notified, so they can advise and where required - support  
926 the investigation.

**9 Allegations against the Managing Director**

- 928 6.91. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
929 Head/Principal) who will make the initial referral to **local Safeguarding Authority/LADO**. Following this,  
930 the allegation should be passed to the identified senior person to follow through with **local Safeguarding**  
931 **Authority/LADO** and subsequently act in line with agreed course of action. This means that the DSL will

932 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
933 gathering any information or, should it be required, in the actual investigation in relation to a senior  
934 member.

935 6.92. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the  
936 matter to **local Safeguarding Authority/LADO** and act in line with agreed course of action.

937 6.93. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### **9.8 Allegations against any other Senior Leader**

939 6.94. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
940 Head/Principal) who will make the initial referral to **local Safeguarding Authority/LADO** Following this,  
941 the allegation should be passed to the identified senior person to follow through with **local Safeguarding**  
942 **Authority/LADO** and subsequently act in line with agreed course of action. This means that the DSL will  
943 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
944 gathering any information or, should it be required, in the actual investigation in relation to a senior  
945 member.

946 6.95. Allegations not linked to specific site must be reported to the person’s (whom allegation is made against)  
947 line manager who will refer the matter to **local Safeguarding Authority/LADO** and act in line with agreed  
948 course of action.

949 6.96. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### **9.9 Allegations against the Chief Operating Officer / Head of Children’s Services**

951 6.97. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
952 Head/Principal) who will make the initial referral to **local Safeguarding Authority/LADO**. Following this,  
953 the allegation should be passed to the identified senior person to follow through with **local Safeguarding**  
954 **Authority/LADO** and subsequently act in line with agreed course of action. This means that the DSL will  
955 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
956 gathering any information or, should it be required, in the actual investigation in relation to a senior  
957 member.

958 6.98. Allegations not linked to specific site must be reported to the Chair of the Care Governance Committee -  
959 Moira Livingstone - who will refer the matter to **local Safeguarding Authority/LADO** and act in line with  
960 agreed course of action.

961 6.99. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### **9.10 Allegations against the Chief Executive Officer**

963 6.100. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
964 Head/Principal) who will make the initial referral to **local Safeguarding Authority/LADO** Following this,  
965 the allegation should be passed to the identified senior person to follow through with **local Safeguarding**  
966 **Authority/LADO** and subsequently act in line with agreed course of action. This means that the DSL will  
967 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
968 gathering any information or, should it be required, in the actual investigation in relation to a senior  
969 member.

970 6.101. Allegations not linked to a specific site must be reported to the Chair of the Care Governance Committee  
971 - Moira Livingstone who will refer the matter to **local Safeguarding Authority/LADO** and act in line with  
972 agreed course of action.

973 6.102. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### **9.11 Low level concerns**

975 6.103. As part of their whole school approach to safeguarding, schools and colleges should ensure that they  
976 promote an open and transparent culture in which all concerns about all adults working in or on behalf

977 of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly  
978 and appropriately.

979 6.104. Creating a culture in which all concerns about adults (including allegations that do not meet the harms  
980 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is  
981 critical. If implemented correctly, this should encourage an open and transparent culture; enable schools  
982 and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of  
983 abuse; and ensure that adults working in or on behalf of the school or college are clear about professional  
984 boundaries and act within these boundaries, and in accordance with the ethos and values of the  
985 institution.

986 6.105. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards  
987 a child does not meet the threshold set out in **LADO referral criteria (KCSIE2021) – meeting the harm  
988 threshold section. If there is any doubt about whether or not the concern meets LADO referral criteria  
989 – LADO should be contacted and advice sought.**

990 6.106. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of  
991 unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have  
992 acted in a way that:

- 993 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of  
994 work; and
- 995 • does not meet the allegations threshold or is otherwise not considered serious enough to  
996 consider a referral to the LADO

997 6.107. Examples of such behaviour could include, but are not limited to:

- 998 • being over friendly with children;
- 999 • having favourites;
- 1000 • taking photographs of children on their mobile phone (this depend on the circumstances,  
1001 so it would require DSL assessment and LADO advice)
- 1002 • engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- 1003 • using inappropriate sexualised, intimidating or offensive language.

1004 6.108. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may  
1005 look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately  
1006 intended to enable abuse.

1007 6.109. It is crucial that any such concerns, including those which do not meet the harm threshold (see [Part Four](#)  
1008 [- Section one](#)), are shared responsibly and with the right person, and recorded and dealt with  
1009 appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf  
1010 of schools and colleges from potential false allegations or misunderstandings.

## 10 The initial response to allegation

1012 6.110. Where the school or college identifies a child/young person has been harmed, that there may be an  
1013 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact

1014 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are  
1015 two aspects to consider when an allegation is made:

1016 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is  
1017 not at risk and referring cases of suspected abuse to the local authority children's social  
1018 care as described in Part one of this guidance.

1019 • **Investigating and supporting the person subject to the allegation** - the case manager  
1020 should discuss with the LADO, the nature, content and context of the allegation, and agree  
1021 a course of action.

1022 6.111. When dealing with allegations, schools and colleges should:

- 1023 • apply common sense and judgement
- 1024 • deal with allegations quickly, fairly and consistently; and
- 1025 • provide effective protection for the child and support the person subject to the allegation.

1026 6.112. Schools and colleges should ensure they understand the local authority arrangements for managing  
1027 allegations, including the contact details and what information the LADO will require when an allegation  
1028 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with  
1029 local procedures to establish the facts to help them determine whether there is any foundation to the  
1030 allegation, being careful not to jeopardise any future police investigation. For example:

- 1031 • was the individual in the school or college at the time of the allegations?
- 1032 • did the individual, or could they have, come into contact with the child?
- 1033 • are there any witnesses? and,
- 1034 • was there any CCTV footage?

1035 6.113. These are just a sample of example questions. Services should be familiar with what initial information  
1036 the LADO will require. This information can be found in local policy and procedural guidance provided by  
1037 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared  
1038 with the HR department to support any investigation.

1039 6.114. When to inform the individual of the allegation should be considered carefully on a case by case basis,  
1040 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1041 6.115. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion  
1042 involving the police and/or children's social care will be convened in accordance with the statutory  
1043 guidance [Working Together to Safeguard Children](#).

1044 6.116. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the  
1045 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps  
1046 with the case manager (A 'case manager' will be the person leading any investigation. This will be either the  
1047 DSL/DSL Deputy which is often the Principal/Head/Registered Manager or, where the case manager is  
1048 the subject of an allegation, it will be the Proprietor or a Director nominated by them). A LADO should be

1049 informed who will lead investigation to ensure there is no conflict of interest or any other concerns  
1050 related to the choice of the case manager.

#### 1051 **No Further Action**

1052 6.117. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO  
1053 should:

- 1054
- record the decision and justification for it; and,
  - agree on what information should be put in writing to the individual concerned and by whom.
- 1055  
1056

#### 1057 **Further enquiries**

1058 6.118. Where further enquiries are required to enable a decision about how to proceed, the LADO and case  
1059 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,  
1060 the investigation should normally be undertaken by a senior member of the school's or college's staff.

1061 6.119. Where there is a lack of appropriate resource within the school or college, or the nature or complexity  
1062 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional  
1063 Manager (Education or Care), a Director, HR Business Partner or an independent investigator if  
1064 appropriate.

1065 6.120. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as  
1066 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,  
1067 depending on the complexity of the case.

1068 6.121. Wherever possible, the first review should take place no later than four weeks after the initial  
1069 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review  
1070 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges  
1071 when considering allegations against adults working with children. The LADO's role is not to investigate  
1072 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,  
1073 children's social care, the school or college, or a combination of these.

#### 1074 **Suspension**

1075 6.122. Suspension should not be an automatic response when an allegation is reported. All options to avoid  
1076 suspension should be considered prior to taking that step. The case manager must consider carefully  
1077 whether the circumstances warrant suspension from contact with children at the school or college, or  
1078 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a  
1079 child or other children at the school or college is/are at risk of harm, or the allegation could be considered  
1080 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR  
1081 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been  
1082 involved. More information on suspension and associated process can be found in [KCSIE 2021 Part 4 page  
1083 86 – 87.](#)

#### 1084 **Supporting those involved**

1085 6.123. The welfare of a child/young person is paramount (how children should be protected and supported is  
1086 set out throughout KCSIE2021 guidance) and this will be the prime concern in terms of investigating an  
1087 allegation against a person in a position of trust. However, when an allegation or safeguarding concern is  
1088 being investigated it is likely to be a very stressful experience for the adult subject of the investigation,  
1089 and potentially for the family members. It is important that an employer offers appropriate welfare  
1090 support at such a time and recognises the sensitivity of the situation. Information is confidential and  
1091 should not ordinarily be shared with the other staff or with children or parents who are not directly

1092 involved in the investigation. More about employers duty of care to their employees can be found in  
1093 [KCSIE2021 part 4/Duty of care.](#)

1094 6.124. Staff whom allegation/s have been made against must always be supported and if suspended they will  
1095 receive a support person (nominated contact), any suspension is not an indication of guilt.

#### 1096 **Allegation outcomes**

1097 6.125. The definitions that should be used when schools and colleges determine the outcome of an allegation  
1098 are set out below:

- 1099 • Substantiated: there is sufficient evidence to prove the allegation;
- 1100 • Malicious: there is sufficient evidence to disprove the allegation and there has been a  
1101 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1102 • False: there is sufficient evidence to disprove the allegation;
- 1103 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.  
1104 The term, therefore, does not imply guilt or innocence; or
- 1105 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the  
1106 allegation being made.

1107 6.126. It should be noted that these definitions are available to support the decision-making process. However,  
1108 in certain cases, in the absence of any substantiating evidence, the Company may still progress through  
1109 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief  
1110 that an employee has committed an act of misconduct.

1111 6.127. Ultimately the options open to the school or college depend on the nature and circumstances of the  
1112 allegations and the evidence and information available. This will range from taking no further action, to  
1113 dismissal or a decision not to use the person's services in future. Suspension should not be the default

1114 position, an individual should be suspended only if there is no reasonable alternative ([see paragraphs](#)  
1115 [361-368 on suspension](#)).

### 1116 **Serious incident reporting**

1117 6.128. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported  
1118 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

### 1119 **Death of someone in our care including rapid response to unexpected death**

1120 6.129. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the  
1121 rapid response process described below:

#### 1122 • **Call the Ambulance and Police**

1123 • Unless the 999 operator tells you to, do not touch the person, do not move anything around them  
1124 which may form part of forensic evidence. Police will make a decision about the forensic examinations  
1125 and appropriate security of the scene.

1126 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI) reporting  
1127 procedure. The DSL will contact the Managing Director of the division they work in and verbally inform  
1128 them of what happened before completing SUI Part 2.

1129 • DSL will contact Children's/Adults Social Care Team

1130 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services (CAMHS)  
1131 should also be notified by the Safeguarding Authority.

1132 6.130. Once the above rapid steps have been taken, further steps described below must be followed.

1133 6.131. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the  
1134 following within 24 hours:

1135 • Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager  
1136 following the **35.01. Caretech Children's services SUI process.**

1137 • Next of kin/parents/carer of the deceased.

1138 • Where the death of an individual occurs in an education location the assistance of the local police and  
1139 social services department should be sought in informing the parents/guardians.

1140 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn

1141 • Ministry of justice if applicable.

1142 • The placing authority/authorities.

1143 • The local authority responsible for Social Services and Education (where the death takes place in a  
1144 registered school) within whose area the education location is situated.

1145 • The District Health Authority within whose area the education location is situated.

1146 • The Department for Education, (where the death takes place in a registered school).

1147 • The Health and Safety Executive.

### 1148 **Abuse of position of trust**

1149 6.132. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,  
1150 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the  
1151 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a  
1152 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1153 member of the staff and a young person under 18 may be a criminal offence, even if that young person  
1154 is over the age of consent.

#### 1155 **Visitors**

1156 6.133. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.  
1157 All unauthorised visitors will be challenged by staff and reported to the home manager/head/principal  
1158 before entry is authorised.

#### 1159 **Volunteers**

1160 6.134. Volunteers undergo checks commensurate with their work in the home/school/college and contact with  
1161 children, young people and adults i.e. if they are in regulated activity or not.

#### 1162 **Contractors**

1163 6.135. We will check the identity of all contractors working on site and requests the full range of DBS and other  
1164 required checks where they work in regulated activity or unsupervised in accordance with the latest  
1165 government guidance.

#### 1166 **Use of school or college premises for non-school/college activities**

1167 6.136. Where governing bodies or proprietors hire or rent out school or college facilities/premises to  
1168 organisations or individuals (for example to community groups, sports associations, and service providers  
1169 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in  
1170 place to keep children safe. More information can be found in [KCSIE2021 Part 2 para 155 & 156](#).

#### 1171 **Extended school and off-site arrangements**

1172 6.137. Where extended off-site activities are provided by and managed by us, our safeguarding policy and  
1173 procedures apply. If other organisations provide services or activities on our site we will check that they  
1174 have appropriate policies and procedures in place, including safer recruitment procedures and clarify  
1175 whose procedure is to be followed if there are concerns. There will be clear communication channels to  
1176 ensure the DSL is kept appropriately informed.

1177 6.138. When our Individuals are doing off-site activities, including day and residential visits and work related  
1178 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL  
1179 will be kept appropriately informed.

#### 1180 **Use of mobile phones**

1181 6.139. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media  
1182 access including **Pro 01. Mobile Telephony Policy** at all times.

1183 6.140. All computer equipment and internet access within the home/school/college is subject to 'parental  
1184 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social  
1185 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons  
1186 during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the  
1187 many learning and social opportunities available through the internet and social media.

1188 6.141. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST  
1189 neither mention **Brook View School** or make reference to their employment at the **Brook View School**.



1190 Staff are advised not to communicate with parents, guardians, carers or Individuals via social networking  
1191 sites

### 11 Photography and images

1193 6.142. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1194 6.143. The vast majority of people who take or view photographs or videos of Individuals do so for entirely  
1195 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through  
1196 taking or using images, so we have some safeguards in place.

1197 6.144. To protect our children, young people or young adults we will:

- 1198 • seek their consent for photographs to be taken or published (for example, on our website or in  
1199 newspapers or publications)
- 1200 • seek parental consent of consent from the Individual
- 1201 • not use their full name with an image, only their initials
- 1202 • ensure that personal data is not shared
- 1203 • store images appropriately, securely and for no longer than necessary
- 1204 • only use school equipment, i.e. not personal devices
- 1205 • encourage our children, young people and adults to tell us if they are worried about any photographs  
1206 that are taken of them

### 12 Physical intervention and use of reasonable force

1208 6.145. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are  
1209 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**  
1210 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,  
1211 recorded and monitored.

### 12 Staff Taking Medication or other substances

1213 6.146. Staff members must not be under the influence of alcohol or any other substance which may affect their  
1214 ability to care for the Individuals. If they are taking medication they should seek medical advice and  
1215 inform the Home Manager/Head/Principal who will review the medical advice and take a decision as to  
1216 whether they are fit for work.

1217 6.147. We only allow staff to work if medical advice confirms that their ability to look after Individuals is unlikely  
1218 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it  
1219 must be securely stored and out of reach of all children, young people and young adults. This section  
1220 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

### 12 Information for individuals and relatives/carers

1222 6.148. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt  
1223 with independently and that they will be kept involved in the process to the degree that they wish to be.  
1224 They will be reassured that they will receive help and support in taking action.

1225 6.149. They will also be advised that they can nominate an advocate or representative to speak and act on their  
1226 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could  
1227 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be  
1228 appointed. They will be advised of rights to legal aid in where appropriate to victim support and  
1229 compensation.

### 12 Recruitment and vetting

1231 6.150. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**  
1232 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1233 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting  
1234 schools should read the whole KCSIE2021 guidance including Part 3 dedicated to Safer Recruitment.

1235 6.151. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply  
1236 teaching and teacher trainees, agency care staff as well as multisite managers and members of the  
1237 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1238 6.152. For agency workers we obtain written confirmation that all checks have been completed, in line with  
1239 safer recruitment from the employment business that is supplying the member of agency staff. All  
1240 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in  
1241 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate  
1242 before that person can begin work at the home/school/college.

1243 6.153. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the  
1244 agency.

1245 6.154. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the  
1246 same recruitment regulations and procedures as the education staff.

### 1247 **Requirements to inform Disclosure and Barring Services (DBS)**

1248 6.155. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the  
1249 barred lists is required.

1250 6.156. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one  
1251 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to  
1252 safeguarding concerns, or would have been had they not resigned.

1253 6.157. In the case of a member of teaching staff at a school or sixth form college, the case manager must  
1254 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching  
1255 [\(paragraph 143 for further information\)](#).

1256 6.158. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,  
1257 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she  
1258 is considered unsuitable to work with children and young people.

1259 6.159. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is  
1260 provided at paragraph 179.

1261 6.160. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they can  
1262 ensure any future references are correct. The references team log referrals so this can be completed. This  
1263 will apply to both: DBS and TRA.

### 1264 **Record-keeping**

1265 6.161. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is  
1266 made, staff must keep clear and accurate records using a Concern Form.

1267 6.162. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in  
1268 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns  
1269 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch  
1270 have Concern/Safeguarding function to record any concerns being raised. A report per child/young  
1271 person can also be generated.

1272 6.163. Records should be factual, accurate, concise, ethical and relevant.

1273 6.164. All recording of written information should be legible and discussions with other professionals and  
1274 agencies should be recorded chronologically.

1275 6.165. There will be a safeguarding section/folder for each Individual which will hold any concerns/safeguarding  
1276 documentation for that individual. At the front of each folder there is an Index for Individual's Concerns.  
1277 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1278 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure  
1279 location.

1280 6.166. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**  
1281 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information  
1282 where the concern has escalated. Where this is held as a paper version this is to be made into a bound  
1283 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies  
1284 only. In either case this should be kept in a secure location.

### 1285 **Monitoring**

1286 6.167. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,  
1287 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**  
1288 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators  
1289 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the  
1290 position of every site in relation to their KPIs is produced every Wednesday.

### 1291 **Training**

1292 6.168. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction  
1293 introduces the new staff member to the policy, procedure and practice at the location. They will also be  
1294 orientated as to where to find information regarding safeguarding including relevant posters around the  
1295 location. As part of their induction all staff are required to read this policy and confirm that they  
1296 understand their role in safeguarding and protecting young people within the service they are going to  
1297 work.

1298 6.169. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must  
1299 be completed as part of staff member induction and annually thereafter. This should include online  
1300 safety. This is to maintain staff awareness of their responsibilities in relation to children /young  
1301 people/young adult's safeguarding.

1302 6.170. Staff will not be allowed to work with Individuals unless they have completed the above training. The  
1303 school/college/home must check that supply/agency staff have completed basic awareness training  
1304 before being allowed into contact with Individuals.

1305 6.171. Contractors and others on site who might have unsupervised access to Individuals must also complete  
1306 basic awareness training before being allowed to start work.

1307 6.172. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and  
1308 practice throughout the year. This can be undertaken in various forums: as a face to face or online  
1309 session, staff meetings or workshops. In addition to this safeguarding updates are provided to schools  
1310 and colleges by the external Safeguarding Network.

1311 6.173. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge  
1312 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA  
1313 within the boundaries they operate and be refreshed at least every two years. Both should also undertake  
1314 Prevent awareness training.

### 1315 **Confidentiality and information sharing**

1316 6.174. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting  
1317 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear  
1318 powers to share, hold and use information for these purposes. Staff should be proactive in sharing  
1319 information as early as possible to help identify, assess and respond to risks or concerns about the safety  
1320 and welfare of children/ young people whether this is when problems are first emerging, or where a child  
1321 is already known to local authority children's social care.

1322 6.175. Where the police are involved, wherever possible the school or college should ask the police to obtain  
1323 consent from the individuals involved to share their statements and evidence for use in the employer's

1324 disciplinary process. This should be done as their investigation proceeds and will enable the police to  
1325 share relevant information without delaying the conclusion of their investigation or any court case.

1326 6.176. The Safeguarding authority should adopt a similar procedure when making enquiries to determine  
1327 whether the child or children named in the allegation are in need of protection or services, so that any  
1328 information obtained in the course of those enquiries which is relevant to a disciplinary case can be  
1329 passed to the employer without delay.

1330 6.177. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the  
1331 following:

- 1332 • who needs to know and exactly what information can be shared;
- 1333 • how to manage speculation, leaks and gossip
- 1334 • what, if any, information can be reasonably given to the wider community to reduce speculation;  
1335 and
- 1336 • how to manage press interest if, and when, it should arise.

1337 6.178. Exchange or disclose of personal information with other agencies will be completed in accordance with  
1338 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including  
1339 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process  
1340 personal information fairly and lawfully and to keep the information they hold safe and secure.

1341 6.179. Information relating to individual Safeguarding cases is confidential, although some information can be  
1342 shared with relevant staff. This should be done only on a 'need to know' basis.

1343 6.180. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data  
1344 protection principles, which allow them to share (and withhold) personal information, as provided for in  
1345 the Data Protection Act 2018 and the GDPR. This includes:

- 1346 • being confident of the processing conditions which allow them to store and share information for  
1347 safeguarding purposes, including information which is sensitive and personal, and should be treated  
1348 as 'special category personal data'.
- 1349 • understanding that 'safeguarding of children and individuals at risk' is a processing condition that  
1350 allows practitioners to share special category personal data. This includes allowing practitioners to  
1351 share information without consent where there is good reason to do so, and that the sharing of  
1352 information will enhance the safeguarding of a child in a timely manner but it is not possible to gain  
1353 consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent  
1354 would place a child at risk.
- 1355 • for schools, not providing pupils' personal data where the serious harm test under the legislation is  
1356 met. For example, in a situation where a child is in a refuge or another form of emergency  
1357 accommodation, and the serious harms test is met, they must withhold providing the data in

1358 compliance with schools’ obligations under the Data Protection Act 2018 and the GDPR. Where in  
1359 doubt schools should seek independent legal advice.

1360 6.181. When sharing safeguarding information regarding an individual, staff will need to consider the following:

- 1361 • Information should only be shared on a ‘need to know’ basis when it is in the best interests of the  
1362 individual
- 1363 • Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse  
1364 or neglect, it may be necessary to override the requirement
- 1365 • Distinguish fact from opinion
- 1366 • Ensure you are giving the right information about the right person
- 1367 • Ensure you are sharing information securely
- 1368 • Inform the person that the information has been shared if they were not already aware of this and if  
1369 it would not create or increase risk of harm to them/others.

1370 6.182. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of  
1371 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the  
1372 need to safeguard and promote the welfare and protect the safety of children.

1373 6.183. Further details on information sharing can be found in:

- 1374 • Chapter one of [Working Together to Safeguard Children](#) , which includes a myth-busting guide to  
1375 information sharing
- 1376 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young  
1377 People, Parents and Carers](#) . The seven golden rules for sharing information will be especially useful
- 1378 • [The Information Commissioner’s Office \(ICO\)](#) , which includes ICO GDPR FAQs and guidance from the  
1379 department
- 1380 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity,  
1381 including compliance with the GDPR.

1382 6.184. The following wording is to be added to any covering letter where we are sharing documentation:

1383 *“The material contained in this letter and its enclosures are confidential to Cambian Group and the persons  
1384 named within the documentation. The documentation is delivered only in accordance with a perceived  
1385 legal obligation to make the documentation available and upon the strict understanding that the recipient  
1386 and all members of the recipient’s staff will undertake to preserve confidentiality and not in any way share  
1387 the documentation or any details of the information therein contained with any other party. Any person  
1388 receiving this information who breaches these obligations of confidentiality will be held strictly responsible  
1389 and will be expected to indemnify Cambian Group and any persons named within the documentation  
1390 against any losses that may arise as a result of misuse of this material”.*

1391 6.185. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for  
1392 the Caldicott Guardian at our location is [Sarah Longley-Cook, Interim Clinical Director](#).

1393 6.186. Failure to follow this policy and local procedure may result in disciplinary action.

### 1394 **Complaints and Monitoring**

1395 6.187. All complaints arising from the operation of this policy will be considered under the **0.22 complaints  
1396 procedure**, with reference to the our Designated Safeguarding Officer who is [Sarah Chatterton](#) (DSL) and  
1397 [Local Authority Lancashire](#) Safeguarding Children’s Board

## 1398 **7. Accountability**

1399 7.1. [Sarah Chatterton](#) is the DSL at Cambian [Brook View School](#) and has lead responsibility for protecting and  
1400 safeguarding children, young people and young adults and liaising with the local authority and other local

1401 agencies as appropriate. This includes young person protections, referrals, raising awareness, training,  
1402 allocating resources and supporting/directing staff within the Location. In all matters relating to young  
1403 person protection and safeguarding **Brook View School** will follow the procedures outlined in this policy.

1404 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by  
1405 the Head of Service. Our Managing/ Operations Director, **Andrew Sutherland** will undertake a full annual  
1406 review of the content and effective application of this policy and associated procedures. The date for the  
1407 next scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes  
1408 in legislation, regulatory requirements or as a result of best practice guidance.

1409 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director  
1410 Compliance, who will support and promote the development of initiatives to improve the prevention,  
1411 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is  
1412 also responsible for reporting on safeguarding and providing executive leadership.

1413 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those  
1414 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can  
1415 be stressful and distressing for staff.

1416 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,  
1417 allied health professionals and nurses) should understand how their professional standards and  
1418 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1419 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level  
1420 need to share a common view of what types of behaviour may be abuse or neglect and what should be  
1421 an initial response to suspicion or allegation of abuse or neglect.

1422 7.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency  
1423 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies  
1424 which define the local practice that must be followed.

1425 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable  
1426 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact  
1427 names and details if required.

## 1428 **8. Further Safeguarding information – what everyone need to know** 1429 **(Appendix 11)**

1430 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours  
1431 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual  
1432 and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children

1433 are at risk. Other safeguarding issues such as peer on peer (child on child) abuse all staff should be aware  
1434 of are explored in the **Appendix 11. Further Safeguarding information – what everyone need to know.**

## 1435 **9. Appendices**

### 1436 **Appendix 1: Relevant policies and documents**

- 1437 **1.** Child Protection and Safeguarding
- 1438 a) 25.01 - Index Form for Individuals Concern File
- 1439 b) 25.02 - Abuse Poster Individual
- 1440 c) 25.03 - Individual Safeguarding booklet – Easy Read
- 1441 d) 25.04 - Concern Form
- 1442 e) 25.05 - Safeguarding Tracking Pack
- 1443 f) 25.06 – Visitor Information Leaflet template
- 1444 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
- 1445 h) 25.08 – Guidance to staff who had an allegation made against them
- 1446 i) 25.09 – Local Safeguarding procedure
- 1447 j) 25.10 – Staff Safeguarding Information poster
- 1448 k) 25.11 – Guidance notes for Designated or On call person
- 1449 l) 25.12 – Static body chart
- 1450 m) 25.13 – Weekly body chart
- 1451 n) 25.14 – Guidance for Investigating Unexplained Body Marks
- 1452 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1453 **2.** Whistleblowing
- 1454 **3.** Anti-bullying
- 1455 **4.** Child Sexual Exploitation
- 1456 **5.** Intimate and Invasive Care
- 1457 **6.** Self-harm and suicide
- 1458 **7.** Behaviour Support
- 1459 **8.** Physical Intervention
- 1460 **9.** Complaints Policy
- 1461 **10.** Health
- 1462 **11.** E –safety
- 1463 **12.** Capacity to consent
- 1464 **13.** Prevent
- 1465 **14.** Recruitment



- 1466 **15.** Code of Conduct
- 1467 **16.** Data Protection
- 1468 **17.** Confidentiality
- 1469 **18.** E- safety
- 1470 **19.** Disciplinary
- 1471 **20.** Complaints
- 1472 **21.** Code of Practice
- 1473 **22.** Mobile telephony
- 1474 **23.** SUI Caretech children’s services process
- 1475 **24.** Caretech - Group Leaving Policy
- 1476 **25.** GHR 02 – Harassment and Bullying
- 1477 **26.** GHR 41 – Reference Requests
- 1478 **27.** GHR 41.1 DBS referral log
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**1503 Appendix 2: Legislation and guidance**

- 1504 • [The Children Act 2004, as amended by the Children and Social Work Act 2017](#)
- 1505 • [Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes \(England\)](#)
- 1506 [Regulations 2015 in force as of 1st April 2015](#)
- 1507 • [Guide to the Young people's/care home Homes Regulations including the Quality Standards \(DfE: April](#)
- 1508 [2015\)](#)
- 1509 • This policy is also in accordance with the Local Safeguarding Young people Board (LSCP) locally agreed
- 1510 inter-agency safeguarding processes and procedures
- 1511 • [Prevent Duty Guidance: for England and Wales \(March 2015\) \(Prevent\). Prevent is supplemented by The](#)
- 1512 [Prevent duty: Departmental advice for schools and young person minders \(June 2015\) and The use of](#)
- 1513 [social media for on-line radicalisation \(July 2015\)](#)
- 1514 • [The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2015](#)
- 1515 • [Female Genital Mutilation Act 2003, \(as inserted by section 74 of the Serious Crime Act 2015\)](#)
- 1516 • [Terrorism Act 2000](#)
- 1517 • [Counter Terrorism and Security Act 2015](#)
- 1518 • [The School staffing regulations, England 2009](#)
- 1519 • [The Teachers Disciplinary regulations, 2012](#)
- 1520 • [Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.](#)
- 1521 • [All Wales Child Protection Procedures 2008](#)
- 1522 • [All Wales POVA Guidance 2008](#)
- 1523 • [Keep learners Safe 2015](#)
- 1524 • [The Care Act 2014](#)
- 1525 • [Social services and wellbeing Act 2014](#)
- 1526 • [Working Together to Safeguard Children 2018](#)
- 1527 • [Keeping children safe in Education 2021](#)
- 1528 • [Keeping children safe in education - part one 2021](#)
- 1529 • [Regulated activity in relation to children: scope](#)
- 1530 • [What to do if you're worried a child is being abused](#)
- 1531 • [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- 1532 • [Violence against women and girls](#)
- 1533 • <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>
- 1534 • [Teaching online safety in school.pdf](#)

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**1547 Appendix 3: Child Protection and safeguarding procedure (Flow chart)**

Version: 12  
Next Review Date: August 2022  
Print Date: 15-Nov-21

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Approved by: P & P Team  
Date: September 2021

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1551

DSL– DSL  
CAF – Common Assessment framework  
CSC– Children’s Social Care  
LADO – Local Authority Designated Officer

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F

Child / Young Adult

Consistent explanation or minor accident	Suspected physical injury, or any report of alleged abuse, including peer on peer	Disclosure/allegation of sexual abuse/harassment including peer on peer	Allegation against staff volunteer/other third party
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In an emergency dial 999, otherwise:

Make a note, keeping all original hand written notes	Serious incident or recurrent episodes or inconsistent explanations	Avoid asking leading questions/young adult, don't promise confidentiality, but provide reassurance
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**REPORT within 1 hour to the DSL or DSL Deputy (if DSL is not available). In Education concerns/allegations against staff are to be referred to the Head/Principal.**

If allegation against the Head / DSL /Proprietor follow specific steps described in section regarding allegations made against specific people

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Record all details on **Concern Form** and pass it on to the DSL/Deputy/Head/Principal if related to staff. Use body map to record visible injuries. NB. This is recorded by the first person the child/anyone else spoke to as soon as possible/no longer than 24 hours.

DSL /Deputy/ Head/Principal will have access to the necessary information: Name/Address/DOB/Siblings/GP and any other information held. The designated safeguarding lead/ Head/Principal will make an initial assessment of the situation and follow the most appropriate route.

Monitor the situation

D  
S  
L

Work with the family through the CAF process where applicable

If it is a safeguarding concern the next sequential Safeguarding Log number will be allocated/ services using Behaviour Watch: the concern number will be given by the system once concern is recorded, and local Safeguarding Authority/LADO contacted as per Local Safeguarding Protocol. Designated safeguarding lead or Head/Principal (depending who will lead on the case) will follow advice from any of the professional above. If a safeguarding concern is confirmed then a safeguarding process **MUST** be followed and Safeguarding Tracking Pack is opened/Services using Behaviour Watch: Concern slip has a Safeguarding Tracking pack built in.

DSL or Head/Principal to inform those that need to know in the service and record details. DSL **MUST** ensure that the chronology of events is **continuously** updated to reflect on advice received and actions already taken. Receive feedback from Safeguarding authority and work with the social worker if the case becomes open to a team.

Local Safeguarding Authority/LADO will make the judgement and communicate with the school/ home in relation to the next step.

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1600 **Appendix 4: Types of abuse – children**

- 1601 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or  
1602 by failing to act to prevent harm. Children may be abused in a family or in an institutional or community  
1603 setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or  
1604 technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by  
1605 another child or children
- 1606 • **Physical abuse:** a form of abuse which may involve hitting, slapping, shaking, throwing, poisoning,  
1607 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm  
1608 may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in  
1609 a child.
- 1610 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse  
1611 effects on the child’s emotional development. It may involve conveying to a child that they are worthless  
1612 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include  
1613 not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of  
1614 what they say or how they communicate. It may feature age or developmentally inappropriate  
1615 expectations being imposed on children. These may include interactions that are beyond a child’s  
1616 developmental capability as well as overprotection and limitation of exploration and learning, or  
1617 preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-  
1618 treatment of another. It may involve serious bullying (including cyberbullying), causing children  
1619 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of  
1620 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1621 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example  
1622 rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of  
1623 clothing. They may also include non-contact activities, such as involving children in the production of  
1624 sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children  
1625 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the  
1626 internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual  
1627 abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding  
1628 issue (also known as peer on peer abuse) in education and all staff should be aware of it and of their  
1629 school or colleges policy and procedures for dealing with it,
- 1630 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an  
1631 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child  
1632 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or  
1633 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence  
1634 or the threat of violence. CSE and CCE can affect children, both male and female and can include children  
1635 who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual  
1636 Exploitation does not always involve physical contact; it can also occur through the use of technology.
- 1637 • **Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result  
1638 in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as  
1639 a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing  
1640 to: provide adequate food, clothing and shelter (including exclusion from home or abandonment);  
1641 protect a child from physical and emotional harm or danger; ensure adequate supervision (including the  
1642 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also  
1643 include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 1644 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through  
1645 social media, online games or other channels of digital communication. Children can also be re-victimised  
1646 if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal  
1647 abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child  
1648 sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual  
1649 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using  
1650 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that  
1651 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as  
1652 inappropriate behaviours or content online. For instance, children may be bullied online by their peers  
1653 or they might, either accidentally or intentionally, view content which is intended for adults. Both online

1654 abuse and exposure to unsuitable content or behaviour can have a long-lasting impact on the wellbeing  
1655 of children and young people.

1656 **Appendix 5: Types of abuse - adults**

- 1657 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling,  
1658 scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone  
1659 purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding  
1660 or withholding food, unauthorized restraint, restricting movement.
- 1661 • **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the  
1662 honour of the family and/or the community including female genital mutilation (FGM), forced marriage  
1663 and practices such as breast ironing. Abuse committed in the context of preserving “honour” often  
1664 involves a wider network of family or community pressure and can include multiple perpetrators. It is  
1665 important to be aware of this dynamic and additional risk factors when deciding what form of  
1666 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be  
1667 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant  
1668 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered  
1669 HBA.
- 1670 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse  
1671 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence  
1672 and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour,  
1673 violence or abuse between those aged 16 or over who are or have been, intimate partners or family  
1674 members regardless of gender or sexuality.
- 1675 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual  
1676 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of  
1677 the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to,  
1678 inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced  
1679 use of pornography or witnessing of sexual acts, Indecent exposure.
- 1680 • **Sexual harassment**- unwanted conducts of a sexual nature that can occur online and offline, sexual  
1681 harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or  
1682 humiliated, and/or create a hostile, offensive or sexualised environment.
- 1683 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing  
1684 services, educational and social opportunities and seeing friends, removing mobility or communication  
1685 aids or intentionally leaving someone unattended when they need assistance, preventing someone from  
1686 meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to  
1687 respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,  
1688 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a  
1689 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1690 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from  
1691 accessing their own money, benefits or assets, employees taking a loan from a person using the service,  
1692 undue pressure, duress, threat or undue influence put on the person in connection with loans, wills,  
1693 property, inheritance or financial transactions, arranging less care than is needed to save money to  
1694 maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to  
1695 access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in  
1696 a family home, someone moving into a person’s home and living rent free without agreement or under  
1697 duress, false representation, using another person’s bank account, cards or documents, exploitation of a  
1698 person’s money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy,  
1699 appointeeship or other legal authority.
- 1700 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as  
1701 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that  
1702 realistically they never will be able to.
- 1703 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and  
1704 civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as  
1705 ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks or  
1706 inappropriate use of language related to a protected characteristic, denying access to communication  
1707 aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on  
1708 the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and

- 1709 criminal justice relating to a protected characteristic, substandard service provision relating to a  
1710 protected characteristic.
- 1711 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-  
1712 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and  
1713 supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful  
1714 attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and  
1715 privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or  
1716 assistance with eating, not offering choice or promoting independence, misuse of medication, failure to  
1717 provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious  
1718 or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence  
1719 or communication, failure to respond to complaints.
  
  - 1720 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,  
1721 stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure  
1722 to administer medication as prescribed, refusal of access to visitors, not taking account of individuals'  
1723 cultural, religious or ethnic needs, not taking account of educational, social and recreational needs,  
1724 ignoring or isolating the person, preventing the person from making their own decisions, preventing  
1725 access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
  
  - 1726 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of  
1727 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,  
1728 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise  
1729 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more  
1730 appropriate under the parts of the Care Act dealing with assessment, planning, information and advice,  
1731 and prevention.  
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**1737 Appendix 6: Signs that someone could be a victim****1738 Physical abuse**

- 1739 • No explanation for injuries or an inconsistent account of what happened
- 1740 • Injuries that don't seem likely, given the person's lifestyle
- 1741 • Bruising, cuts, welts, burns, marks on the body or loss of hair in clumps
- 1742 • Frequent injuries
- 1743 • Unexplained falls
- 1744 • Subdued or changed behaviour in the presence of a particular person
- 1745 • Signs of malnutrition (not having enough to eat)
- 1746 • Failure to seek medical treatment or frequent changes of GP

**1747 Sexual abuse**

- 1748 • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- 1749 • Torn, stained or bloody underclothing
- 1750 • Bleeding, pain or itching in the genital area
- 1751 • Unusual difficulty in walking or sitting
- 1752 • Foreign bodies in genital or rectal openings
- 1753 • Infections, unexplained genital discharge, or sexually transmitted diseases
- 1754 • Pregnancy in a child or young person who cannot consent to sexual intercourse
- 1755 • Using unexpectedly explicit sexual language
- 1756 • Major changes in sexual behaviour or attitude
- 1757 • Incontinence not to do with a medical condition
- 1758 • Self-harming
- 1759 • Poor concentration, withdrawal, sleep disturbance
- 1760 • Excessive fear of or withdrawal from relationships
- 1761 • Fear of receiving help with personal care
- 1762 • Not wanting to be alone with a particular person

**1763 Psychological or emotional abuse**

- 1764 • An air of silence when a particular person is present
- 1765 • Withdrawal or change in the psychological state of the person
- 1766 • Insomnia (not sleeping)
- 1767 • Low self-esteem
- 1768 • Uncooperative and aggressive behaviour
- 1769 • A change of appetite, weight loss or gain
- 1770 • Signs of distress: tearfulness, anger
- 1771 • Apparent false claims by someone involved with the person, to attract unnecessary treatment

**1772 Neglect and acts of omission**

- 1773 • Poor environment – dirty or unhygienic
- 1774 • Poor physical condition and/or personal hygiene
- 1775 • Pressure sores or ulcers
- 1776 • Malnutrition or unexplained weight loss
- 1777 • Untreated injuries and medical problems
- 1778 • Inconsistent or reluctant contact with medical and social care organizations
- 1779 • A build-up of medication that hasn't been taken
- 1780 • Uncharacteristic failure to engage in social interaction

1781 Unsuitable clothing or not enough clothes

1782

1783 **Domestic abuse**

1784 • becoming anxious or depressed

1785 • having difficulty sleeping

1786 • complaining of physical symptoms such as tummy aches

1787 • starting to wet their bed

1788 • behaving as though they are much younger than they are

1789 • having problems with school

1790 • becoming aggressive or they may internalise their distress and withdraw from other people

1791 • having a lowered sense of self-worth

1792 • older children may begin to play truant or start to use alcohol or drugs

1793 • they beginning to self-harm by taking overdoses or cutting themselves

1794

1795 **Peer on Peer abuse**

1796 • absence from school or disengagement from school activities

1797 • physical injuries

1798 • mental or emotional health issues

1799 • becoming withdrawn – lack of self esteem

1800 • lack of sleep

1801 • alcohol or substance misuse

1802 • changes in behavior

1803 • inappropriate behavior doe age

1804 • abusive towards others

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**Appendix 7: Signs that someone could be an abuser**

- 1839 • Using restraint when it's not needed
- 1840 • Having favourites
- 1841 • Giving treats, presents or money to certain people without permission from a manager
- 1842 • Finding ways to spend time with a particular child, young person or young adult, perhaps by working
- 1843 longer hours or giving up free time
- 1844 • Finding ways to spend time alone with a particular child, young person or young adult , for example in a
- 1845 car or somewhere else
- 1846 • Inviting a particular child, young person or young adult at risk to their own house without permission
- 1847 from a manager
- 1848 • Being over-friendly with a child, young person or young adult's parents or guardians without permission
- 1849 from a manager
- 1850 • Taking photos of the child, young person or young adult that aren't for work purposes
- 1851 • Trying to make private contact with a particular child, young person or young adult , including by text,
- 1852 email, mobile phone, online or in letter
- 1853 • Finding ways to have physical contact, like play-fighting or tickling
- 1854 • Keeping collections of toys or other items that might attract children or people at risk
- 1855 • controlling behaviour
- 1856 • Narcissistic characteristics
- 1857 • bullying
- 1858 • being forced into a sexual act
- 1859 • humiliation
- 1860 • constant yelling and shouting
- 1861 • the threat or use of violence
- 1862 • destroying personal items
- 1863 • limiting contact with family, friends and work colleagues
- 1864 • checking up on your whereabouts
- 1865 • accusing the child/young person (the victim), of committing the abuse when it is the other way around.
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1883 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**  
1884 **and recording procedure**

1885 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1  
1886 hour from the moment of disclosure/report from the child/young person/other person, completes and  
1887 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of  
1888 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern is  
1889 related to the staff and the Head/Principal is not available, staff must report their concern to the DSL  
1890 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal  
1891 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally before  
1892 completing the Concern/Safeguarding slip in the system.

1893 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details  
1894 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on  
1895 the Concern Form. Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the  
1896 concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened  
1897 (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).

1898 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or  
1899 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on  
1900 the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and  
1901 immediately (or at least within one hour of receiving the concern form, make a referral to the local  
1902 Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to discuss the  
1903 allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the Behaviour Watch  
1904 system will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible  
1905 to the Safeguarding Team.

1906 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a  
1907 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the  
1908 Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal  
1909 Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their  
1910 Senior Management Team is assigned to look into the concern. The review must be recorded and  
1911 outcomes shared with the people involved. Feedback from the review session MUST be provided to local  
1912 Safeguarding Authority/LADO. Services using the Behaviour Watch system will follow the same set of  
1913 steps apart from populating the Central Log of Concerns and Safeguarding as the log can be generated  
1914 by the system using chosen filtering criteria.

1915 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken.  
1916 This diligent approach will ensure a clear historic record of contact with local Safeguarding  
1917 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with  
1918 the local Safeguarding Authority/LADO whichever appropriate.

1919 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it  
1920 requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must  
1921 be opened with the next sequential Safeguarding Reference included on the form and details as such  
1922 entered on the central log.

1923 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking Pack  
1924 being opened, a one record will be created including the original concern, with the whole document  
1925 having the same slip number.

1926 • Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the  
1927 **Responsible/Nominated Individual and** in day schools - **Regional Education Manager** as a follow up to  
1928 the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual**  
1929 **and Regional Education Manager** on completion, providing detailed overview of the actions taken and  
1930 the final outcome. Services using the Behaviour Watch will be able to trigger live notification to the  
1931 Regional Manager (Education/Care), Responsible/Nominated Individual and Registered Manager – where  
1932 appropriate. The **Responsible/Nominated Individual and Regional Education Manager** in day schools

- 1933 will update relevant Directors. This original form will be saved in the Safeguarding file/Behaviour Watch  
1934 – Concern/SG module.
- 1935 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the  
1936 local Police should be informed immediately as well and they can take immediate protective action as  
1937 necessary.
- 1938 • If the matter is a more general concern then ensure that the ‘Action Taken’ log on the concern form is  
1939 completed and the form is filed within the Safeguarding file. Either way the form must be signed by the  
1940 DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use  
1941 Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people,  
1942 staff or children/young people and staff.
- 1943 • The relevant concern form should be referenced in the Individual’s **25.01 Index form for Individual**  
1944 **concern/safeguarding file** and the site’s **25.07 Central Log of Concerns and Safeguarding**. Services using  
1945 Behaviour Watch will be able to filter information per chosen criteria and also generate reports per each  
1946 child/young person in the school, college, children’s or care homes.
- 1947 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack**  
1948 **/Behaviour Watch Concern/SG module**.
- 1949 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed in  
1950 writing that the concern is closed and Responsible/Nominated Individual and Regional Education  
1951 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is  
1952 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off**  
1953 **have been completed**. Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the Safeguarding  
1954 **file**.
- 1955 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local  
1956 Authority and/or the police. The individual can be kept in their care home or on the school/college site  
1957 fully supported (e.g. if they are a day student) if advised to do so.
- 1958 • The parent/carers should be informed and a decision should be made with the Local Authority and the  
1959 Police about what action is to be taken and whom by.
- 1960 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been  
1961 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an  
1962 abuse referral but may help to clarify the situation but they must record all details of any conversation  
1963 and advice received on a concern form. He/she can then move to a formal referral or actively monitor  
1964 the situation.
- 1965 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or  
1966 allegation of abuse directed against anyone working within the establishment. The establishment **MUST**  
1967 not internally investigate any allegations of abuse without first taking instruction from the local  
1968 Safeguarding Authority/LADO.
- 1969 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal  
1970 management investigation (level 2), the investigation process will commence.
- 1971 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the  
1972 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to  
1973 assist the external agency to ensure the investigation is completed without a delay.
- 1974 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within  
1975 the time frame specified by their regulator. This is regardless of who leads on the investigation and  
1976 whether or not the investigation has been concluded.
- 1977 • If as the result of an investigation there has been a substantiated allegation against a member of staff,  
1978 we will work with the local Safeguarding Authority/LADO to determine whether there are any  
1979 improvements to be made to our safeguarding policy, procedures and practice to prevent similar events

1980 in the future. Also we will work with our internal Human Resources department and may commence  
1981 proceedings under **GHR 27. Disciplinary policy and procedure.**

1982 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.  
1983 Records are kept of all conversations as part of the investigation process and made available as  
1984 required.

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## Appendix 9: Key contacts

2021

2022 DSL is Sarah Chatterton (Headteacher/Principal)

2023

2024 Telephone (24hrs) 07501 388 075

Email: sarah.chatterton@cambiagroup.com

2025

2026 DSL Deputy is Gemma Armer

2027

2028 Telephone (24hrs) 07795 830 713

Email: gemma.armer@cambiagroup.com

2029

2030 Outside of hours please refer to your school/home on- call rota and 24/7 contact number which can be found:

2031

2032 Home Manager is Rose Geraghty

Email: rose.geraghty@cambiagroup.com

2033

2034 Telephone (24hrs)

2035

2036

2037 Managing Director is Andrew Sutherland

2038

2039 Telephone (24hrs)

Email: [Andrew.sutherland@caretech-uk.com](mailto:Andrew.sutherland@caretech-uk.com)

2040

2041 Group Executive Director – Children’s Services is Jeremy Wiles

2042

2043 Telephone: 079190232207

Email: Jeremy.Wiles@caretech-uk.com

2044

2045 Organisation’s Strategic Safeguarding Lead is Amanda Sherlock - Group Executive Director - Compliance

2046

2047 Telephone: 01707 601 800

Email: Amanda.Sherlock@caretech-uk.com

2048

2049 Representative, Proprietor - Caretech Education Services is Andrew Sutherland – MD of Education Services

2050

2051 Telephone: 07701314378

Email: Andrew.Sutherland@caretech-uk.com

2052

### Local authority

2053

2054 Lancashire Local Authority &amp; Safeguarding Children’s Board

2055

2056 Lancashire Local Authority &amp; Local Safeguarding Adults’ Board

2057

2058 Telephone 030 123 6720

2059

2060 Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm

2061

2062 Outside of office hours

2063

2064 Preston police telephone number 01772 614444)

2065

2066 The non-emergency police telephone number is: 101.

2067

### For young people under the age of 18:

2068

2069 The Local Authority Designated Officer (LADO) is Tim Booth

2070

2071 Telephone 01772 536694 (Office hours:.. Outside of office hours/weekends, the emergency duty team can be contacted

2072 Child care Referrals Customer Service 0845 053 0009

2073

### Local Safeguarding Authority

2074 The name, address and contact details for the Local Safeguarding Board is as follows:



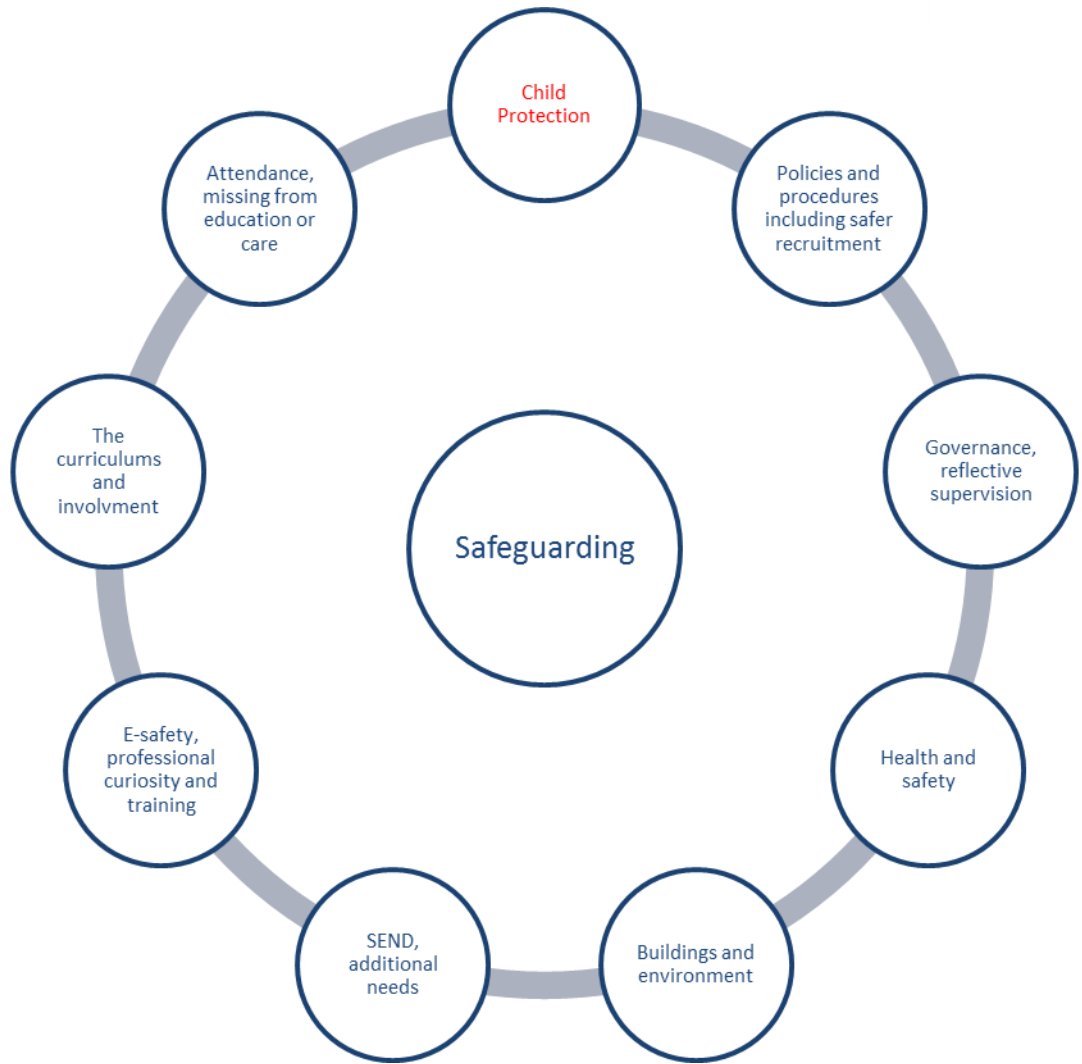
2078  
2079 Address: Room CH3:37/ CH3:40, County Hall, Preston, PR1 0LD

2080  
2081 Telephone (24hrs): 01772 536954

Email: [children.cypsafeguarding@lancashire.gov.uk](mailto:children.cypsafeguarding@lancashire.gov.uk)

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**Appendix 10. Safeguarding in children’s Services - illustration**



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**Appendix 11. Further Safeguarding information – what everyone needs to know**

2139

**Contextual safeguarding**

2140 9.1. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s  
2141 experiences of significant harm beyond their families. It recognises that the different relationships that  
2142 young people form in their neighbourhoods, schools, colleges, children’s/care homes and online can  
2143 feature violence and abuse. Parents and carers have little influence over these contexts, and young  
2144 people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore  
2145 children’s social care practitioners need to engage with individuals and sectors who do have influence  
2146 over/within extra- familial contexts, and recognise that assessment of, and intervention with, these  
2147 spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the  
2148 objectives of child protection systems in recognition that young people are vulnerable to abuse in a range  
2149 of social contexts’.

2150 9.2. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors  
2151 outside the school or college and/or can occur between children outside of these environments. All staff,  
2152 but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation  
2153 in situations outside their families. Extra-familial harms take a variety of different forms and children can  
2154 be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation,  
2155 and serious youth violence (KCSiE2021). Further advice for schools and colleges is provided in the [Home  
2156 Office’s Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and  
2157 vulnerable adults: county lines guidance](#)

2158 9.3. Children’s social care assessments should consider where children are being harmed in contexts outside  
2159 the home (family home, children’s/care home), so it is important that schools, colleges and  
2160 children’s/care homes provide as much information as possible as part of the referral process. This will  
2161 allow any assessment to consider all the available evidence and enable a contextual approach to address  
2162 such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

2163 9.4. We will consider the various factors that have an interplay with the life of any child/young person about  
2164 whom we have concerns within the setting and the level of influence that these factors have on their  
2165 ability to be protected and remain free from harm particularly when it comes to child exploitation or  
2166 criminal activity.

2167 9.5. Whilst this term applies to this specific definition, the notion of considering a child/young person within  
2168 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the  
2169 school, college, children’s/care home gates, within their family home when they visit (children attending  
2170 residential education), within the family (day students) and within the community (extracurricular off site  
2171 activities, events, groups and clubs) are key considerations when the DSL is looking at any concerns.

2172 **Bullying**

2173 9.6. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure** acknowledges  
2174 that to allow or condone bullying may lead to consideration under child protection procedures. Bullying  
2175 is a safeguarding matter that if left unresolved can become a child protection matter. Our settings take  
2176 seriously any bullying concerns and both investigate and take action to protect Individuals where  
2177 appropriate.

2178 **Peer on peer (child on child) abuse**

2179 9.7. Boarding schools, residential special schools, residential colleges and children’s homes and care homes  
2180 for young adults attending education (FE colleges) have additional factors to consider with regard to  
2181 safeguarding. Schools and colleges that provide such residential accommodation and/or are registered  
2182 as children’s homes should be alert to signs of abuse in such settings (for example, inappropriate pupil or  
2183 student relationships and the potential for peer on peer abuse, particularly in schools and colleges where  
2184 there are significantly more girls than boys or vice versa) and work closely with the host local authority  
2185 and, where relevant, any local authorities that have placed their children there. All residential setting  
2186 within the Organisation children’s service will continuously maintain their communication with the  
2187 internal and external Education providers to ensure the additional factors are being considered and any  
2188 concerns shared in a timely manner and with the right people.

2189 9.8. All staff should be aware that children can abuse other children (often referred to as peer on peer abuse)  
2190 and that it can happen both inside and outside of school/college/children’s/care home and online. It is

- 2191 important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify  
2192 it and respond to reports. In some schools, colleges, children's / care homes site – based or regional  
2193 members of therapy teams might need to be involved and support the SLT to identify the most effective  
2194 ways of communication with the child/young person who may have potentially been the victim of Peer  
2195 on Peer abuse and who instigated it.
- 2196 9.9. It must be recognised that children and young people would require varied approaches and  
2197 communication mechanisms to be present and available so they can report abuse. Children must be  
2198 regularly reassured that their concern/reports will be treated seriously every time they report it.
- 2199 9.10. Children needs to be told what will happen from the moment their concern is shared, so the lack of  
2200 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.  
2201 Children need to know that that their concerns will be investigated and dealt with. Child's/young person's  
2202 preference in terms of how feedback should be provided must be taken into consideration so this can be  
2203 planed for in advance.
- 2204 9.11. The communication with each child throughout the process of Peer on peer abuse investigation must be  
2205 regular, proportionate and take place using suitable communication.
- 2206 9.12. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't  
2207 receive timely and appropriate support from the school/college, hence the communication and support  
2208 must become one of the critical points of a significant priority to those responding to and those managing  
2209 peer on peer abuse cases including those of a sexual nature. Other consideration for all providers were:
- 2210 • to assume it is happening here and plan accordingly
  - 2211 • work on and strengthen the whole school, college, children's/care home approach to developing  
2212 a safeguarding culture
  - 2213 • to ensure staff model respectful behaviour
  - 2214 • to ensure children and young people are clear about acceptable and unacceptable behaviour
  - 2215 • to ensure children/young people are confident to ask for help
  - 2216 • to ensure carefully planned and implemented RSHE curriculum
  - 2217 • to ensure the behavioural approach with sanctions & interventions for poor behaviour
  - 2218 • to have mechanisms to support students who need it in the way they need it
  - 2219 • to ensure staff have access to suitable training & that there are clear expectation for staff and  
2220 Managers
  - 2221 • to ensure pupil's voice in heard and responded to
  - 2222 • to ensure DSLs have some protected time to engage with local safeguarding partners and LADOs,  
2223 so those relationships can be strengthen
  - 2224 • to ensure staff follow the guidance in Keeping Children Safe in Education  
2225
- 2226 9.13. All staff should understand, that even if there are no reports in their schools or colleges it does not mean  
2227 it is not happening, it may be the case that it is just not being reported. As such it is important if staff  
2228 have any concerns regarding peer on peer abuse they should speak to their DSL (or deputy).
- 2229 9.14. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and  
2230 harassment. Staff must NOT take the view that it doesn't not happen in their setting. It is essential that  
2231 all staff understand the importance of challenging inappropriate behaviours between peers, many of  
2232 which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example  
2233 dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being



2234 boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst  
2235 case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming  
2236 forward to report it.

2237 9.15. The Organisation recognises that it is more likely that girls will be victims and boys’ perpetrators, but that  
2238 all peer on peer abuse is unacceptable and will be taken seriously. It is essential that all victims are  
2239 reassured that they are being taken seriously and that they will be supported and kept safe.

2240 9.16. Peer on peer abuse is most likely to include, but may not be limited to:

- 2241
- 2242 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - 2243 • abuse in intimate personal relationships between peers
  - 2244 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm  
2245 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
  - 2246 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online  
2247 element which facilitates, threatens and/or encourages sexual violence). For further information about  
2248 sexual violence see [Annex B.](#)
  - 2249 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may  
2250 be standalone or part of a broader pattern of abuse; For further information about sexual harassment  
2251 see [Annex B.](#)
  - 2252 • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch  
2253 themselves sexually, or to engage in sexual activity with a third party
  - 2254 • consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as  
2255 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance:  
2256 [Sharing nudes and semi-nudes advice for education settings.](#)
  - 2257 • Upskirting ( For further information about upskirting see Annex B) which typically involves taking a  
2258 picture under a person’s clothing without their permission, with the intention of viewing their genitals  
2259 or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

2260 9.17. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or  
2261 humiliation used as a way of initiating a person into a group and may also include an online element)

2262 9.18. Staff must be clear as to the school/college’s/home’s procedures with regards to peer on peer abuse and  
2263 the important role they have to play in preventing it and responding where they believe a child may be  
2264 at risk from it.

2265 9.19. All Individuals will be provided with safeguarding information in a format which is appropriate for their  
2266 understanding and communication. This may take the form of posters or a leaflet/booklet.

2267 9.20. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing  
2268 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be  
2269 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.  
2270 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or  
2271 acceptable. However, it is critical to state that some children with cognitive impairment may not be able  
2272 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will  
2273 work with each of the children affected by the situation in order to enhance their understanding of the  
2274 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

### 2275 Serious violence

2276

2277 9.21. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with  
2278 serious violent crime. These may include increased absence from school, a change in friendships or  
2279 relationships with older individuals or groups, a significant decline in performance, signs of self-harm or  
2280 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new

- 2281 possessions could also indicate that children have been approached by, or are involved with, individuals  
2282 associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 2283 9.22. All staff should be aware of the range of risk factors which increase the likelihood of involvement in  
2284 serious violence, such as being male, having been frequently absent or permanently excluded from  
2285 school, having experienced child maltreatment and having been involved in offending, such as theft or  
2286 robbery. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and  
2287 gang involvement and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).
- 2288 9.23. Sexual violence and sexual harassment between children can occur between two children of **any age and**  
2289 **sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur through  
2290 a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2291 9.24. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful  
2292 and distressing. This will, in all likelihood, adversely affect their educational attainment and will be  
2293 exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same  
2294 children’s/care home. Sexual violence and sexual harassment exist on a continuum and may overlap, they  
2295 can occur online and face to face (both physically and verbally) and are never acceptable. All staff working  
2296 with children are advised to maintain an attitude of ‘it could happen here’.
- 2297 9.25. It is essential that all victims are reassured that they are being taken seriously and that they will be  
2298 supported and kept safe. **A victim should never be given the impression that they are creating a problem**  
2299 **by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed  
2300 for making a report.
- 2301 9.26. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that  
2302 victims are protected, offered appropriate support and every effort is made to ensure their education is  
2303 not disrupted. It is also important that other children, adult students and school and college staff are  
2304 supported and protected as appropriate.
- 2305 9.27. There is support available for schools and colleges. Paragraph 52 and Annex A in the [Sexual Violence](#)  
2306 [and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed information  
2307 and links to resources.
- 2308 9.28. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with  
2309 special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2310 9.29. Staff should be aware of the importance of:
- 2311 • challenging inappropriate behaviours;
  - 2312 • making clear that sexual violence and sexual harassment is not acceptable, will never be  
2313 tolerated and is not an inevitable part of growing up;
  - 2314 • not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing  
2315 up”, “just having a laugh” or “boys being boys”; and
  - 2316 • challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms,  
2317 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or  
2318 tolerating such behaviours risks normalising them.
- 2319 9.30. Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to  
2320 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is  
2321 developmentally inappropriate and may cause developmental damage. An umbrella term for these types  
2322 of behaviour are often referred to as “**harmful sexual behaviour**”. The term has been widely adopted in  
2323 child protection. Harmful sexual behaviour can occur online and/or offline and can also occur  
2324 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection  
2325 context.
- 2326 9.31. Situations where children/young people are forced or coerced into sexual activity by peers or associates  
2327 can be related with gang / serious youth violence activity but that is not always the case. Peer influence

- 2328 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many  
 2329 young people see it as a “way out” from their day to day life and feel a strong bond with their peers, one  
 2330 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying  
 2331 include:
- 2332 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that  
 2333 makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their  
 2334 colour, ethnicity, culture, faith community, national origin or national status.
  - 2335 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender  
 2336 is used as a weapon by boys or girls, this may also include any of the following:
    - 2337 - spreading rumors about someone's alleged sex life
    - 2338 - using offensive terms to describe a person
    - 2339 - inappropriate touching or attempts to do so
    - 2340 - non-consensual sharing of sexual images and videos
    - 2341 - unwanted sexual comments and messages, including those on social media
    - 2342 - any sexual exploitation, coercion and threats
    - 2343 - sexual assault and rape
  - 2344 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or knowledge,  
 2345 with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual  
 2346 gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any  
 2347 gender, can be a victim The Voyeurism Offences Act, which was commonly known as the Upskirting  
 2348 Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.
  - 2349 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are transgender,  
 2350 thought to be transgender, or whose gender expression doesn’t conform to traditional gender roles.  
 2351 Transphobia can prevent transgender and gender nonconforming people from living full lives free  
 2352 from harm.
  - 2353 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual  
 2354 orientation);
  - 2355 • **Disablist Bullying** - targets a young person solely based on their disability. This can include  
 2356 manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a  
 2357 certain aspect of the victim’s disability.
  - 2358 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect attitude (usually  
 2359 negative) towards an individual based solely on the individual's membership of a social group. For  
 2360 example, a person may hold prejudiced views towards a certain race or gender etc. (e.g.

2361 sexist). **Discrimination** is the behavior or actions, usually negative, towards an individual or group of  
2362 people, especially on the basis of sex/race/social class.

2363 9.32. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE2021/Annex B](#)  
2364 (pages 139 – 140) and more details about how to respond have been included in [KCSIE 2021 Part 5. Child](#)  
2365 [on child sexual violence and sexual harassment](#).

#### 2366 **What staff should do if they have concerns about the child/young person**

2367 9.33. Staff working with children/young people are advised to maintain an attitude of ‘it could happen here’  
2368 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff  
2369 should always act in the best interests of the child/young person

2370 9.34. If staff have any concerns about a child’s/young person welfare, they should act on them immediately by  
2371 following this procedure and reporting their concern to the DSL/DSL Deputy.

#### 2372 **Opportunities to teach safeguarding**

2373 9.35. Governing bodies and proprietors should ensure that, as part of the requirement for staff to undergo  
2374 regular updated safeguarding training, including online safety and the requirement to ensure children  
2375 are taught about safeguarding, including online safety, that safeguarding training for staff, including  
2376 online safety training, is integrated, aligned and considered as part of the whole school or college  
2377 safeguarding approach and wider staff training and curriculum planning.

2378 9.36. Whilst considering the above training requirements, governing bodies and proprietors should have  
2379 regard to the [Teachers’ Standards](#) which set out the expectation that all teachers manage behaviour  
2380 effectively to ensure a good and safe educational environment and requires teachers to have a clear  
2381 understanding of the needs of all pupils.

2382 9.37. Governing bodies and proprietors should ensure that children are taught about safeguarding, including  
2383 online safety, and recognise that a one size fits all approach may not be appropriate for all children, and  
2384 a more personalised or contextualised approach for more vulnerable children, victims of abuse and some  
2385 SEND children might be needed.

2386 9.38. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may  
2387 cover relevant issues through tutorials). This may include covering relevant issues for schools through  
2388 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary  
2389 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found  
2390 here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health](#)  
2391 [education](#).

2392 9.39. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:  
2393 Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics

2394 and non-statutory implementation guidance. The following resources may also help schools and colleges  
2395 understand and teach about safeguarding:

- 2396 • DfE advice for schools: [teaching online safety in schools](#);
- 2397 • UK Council for Internet Safety (UKCIS)<sup>32</sup> guidance: [Education for a connected world](#);
- 2398 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with](#)  
2399 [children and young people](#);
- 2400 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum  
2401 impact of any online safety sessions delivered by external visitors;
- 2402 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2403 • Public Health England: [Rise Above](#)

2404 9.40. As schools and colleges increasingly work online, it is essential that children are safeguarded from  
2405 potentially harmful and inappropriate online material. Whilst it is essential that governing bodies and  
2406 proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful  
2407 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with  
2408 regard to online teaching and safeguarding.

#### 2409 **Online safety**

2410 9.41. It is essential that children are safeguarded from potentially harmful and inappropriate online material.  
2411 An effective whole school and college approach to online safety empowers a school or college to protect  
2412 and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,  
2413 intervene in, and escalate any concerns where appropriate.

2414 9.42. The breadth of issues classified within online safety is considerable, but can be categorised into four areas  
2415 of risk which we'll refer to as 4Cs later on:

- 2416 • **content:** being exposed to illegal, inappropriate or harmful content, for example:  
2417 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation  
2418 and extremism.
- 2419 • **contact:** being subjected to harmful online interaction with other users; for example: peer  
2420 to peer pressure, commercial advertising and adults posing as children or young adults with  
2421 the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2422 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for  
2423 example, making, sending and receiving explicit images (e.g consensual and non-  
2424 consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit  
2425 images and online bullying; and
- 2426 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or  
2427 financial scams. If you feel your pupils, students or staff are at risk, please report it to the  
2428 Anti-Phishing Working Group <https://apwg.org/>

2429 9.43. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and  
2430 implementing policies and procedures. This will include considering how online safety is reflected as  
2431 required in all relevant policies and considering online safety whilst planning the curriculum, any teacher  
2432 training, the role and responsibilities of the DSL and any parental engagement.

#### 2433 **Online safety policy**

2434 9.44. Online safety and the school or college’s approach to it should be reflected in the child protection policy.  
2435 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college  
2436 should have a clear policy on the use of mobile and smart technology. Amongst other things this will  
2437 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone

2438 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually  
2439 harass their peers via their mobile and smart technology, share indecent images: consensually and non-  
2440 consensually (often via large chat groups), and view and share pornography and other harmful content.  
2441 Schools and colleges should carefully consider how this is managed on their premises and reflect in their  
2442 mobile and smart technology policy and their child protection policy.

2443 9.45. Information and support available to schools and colleges to keep children safe online can be found in  
2444 [KCSIE 2021 Annex D](#).

#### 2445 **Remote Learning**

2446 9.46. Where children are being asked to learn online at home the Department has provided advice to support  
2447 schools and colleges do so safely: [Schools Covid-19 operational guidance](#) (this covers Remote education)  
2448 and [safeguarding and remote education](#). The NSPCC and PSHE Association also provide helpful advice:

- 2449 • NSPCC Learning - [Undertaking remote teaching safely during school closures](#)
- 2450 • PSHE - [PSHE Association coronavirus hub](#)

#### 2451 **Filters and monitoring**

2452 9.47. Whilst considering their responsibility to safeguard and promote the welfare of children and provide  
2453 them with a safe environment in which to learn, governing bodies and proprietors should be doing all  
2454 that they reasonably can to limit children's exposure to the above risks from the school's or college's IT  
2455 system. As part of this process, governing bodies and proprietors should ensure their school or college  
2456 has appropriate filters and monitoring systems in place. Governing bodies and proprietors should  
2457 consider the age range of their children, the number of children, how often they access the IT system and  
2458 the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and  
2459 seek advice and support required.

2460 9.48. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges  
2461 and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK Safer Internet  
2462 Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer  
2463 Internet Centre: [appropriate filtering and monitoring](#).

#### 2464 **Information security and access management**

2465 9.49. Education settings are directly responsible for ensuring they have the appropriate level of security  
2466 protection procedures in place, in order to safeguard their systems, staff and learners and review the  
2467 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.  
2468 Guidance on e-security is available from the National Education Network. In addition, broader guidance  
2469 on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.

#### 2470 **Reviewing online safety**

2471 9.50. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should  
2472 consider carrying out an annual review of their approach to online safety, supported by an annual risk  
2473 assessment that considers and reflects the risks their children face. A free online safety self-review tool  
2474 for schools can be found via the [360 safe website](#).

2475 9.51. UKCIS has published [Online safety in schools and colleges: Questions from the governing board](#). The  
2476 questions can be used to gain a basic understanding of the current approach to keeping children safe  
2477 online; learn how to improve this approach where appropriate; and find out about tools which can be  
2478 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of

2479 trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development  
2480 and monitoring.

2481 **Information and support**

2482 9.52. There is a wealth of additional information available to support schools, colleges and parents to keep  
2483 children safe online. A sample is provided at [Annex D](#) (page 152 – 154).

2484 **Cyberbullying**

2485 9.53. Central to Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all  
2486 children/young people have a right not to be bullied’. School/colleges also recognises that it must take  
2487 note of bullying perpetrated outside school/college which spills over into the school/college; therefore  
2488 once aware services will respond to any cyber-bullying we become aware of carried out by  
2489 children/young people when they are away from the site.

2490 9.54. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using  
2491 electronic forms of contact repeatedly over time against a victim who cannot easily defend  
2492 himself/herself.’

2493 • By cyber-bullying, we mean bullying by electronic media:

2494 • Bullying by texts or messages or calls on mobile ‘phones

2495 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2496 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,  
2497 personal websites, social networking sites

2498 • Using e-mail to message others

2499 • Hijacking/cloning e-mail accounts

2500 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2501 9.55. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory  
2502 information in any media including internet sites.

2503 9.56. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public  
2504 electronic communications network, a message or other matter that is grossly offensive or one of an  
2505 indecent, obscene or menacing character.

2506 9.57. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct  
2507 amounting to harassment.

2508 9.58. If services become aware of any incidents of cyberbullying, they will need to consider each case  
2509 individually as to any criminal act that may have been committed. The services will pass on information  
2510 to the police if it feels that it is appropriate or is required to do so.

2511 **Gaming – raising awareness**

2512 9.59. Online gaming is an activity in which the majority of children and young people and many adults get  
2513 involved. The services will raise awareness by talking to children/young people/key workers/staff and  
2514 also where appropriate parents/carers involved about the games their children play and help them  
2515 identify whether they are appropriate.

2516 **Nudes/semi nudes images or videos**

2517 9.60. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others,  
2518 or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any

2519 device that enables the sharing of media and messages. Sexting may also be called: trading nudes, dirties,  
2520 pic for pic.

2521 9.61. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the  
2522 person doing it is a child. A young person is breaking the law if they:

2523 • take an explicit photo or video of themselves or a friend

2524 • share an explicit image or video of a child, even if it's shared between children of the same age

2525 • possess, download or store an explicit image or video of a child, even if the child gave their permission  
2526 for it to be created.

2527 9.62. However, if a young person is found creating or sharing images, the police can choose to record that a  
2528 crime has been committed but that taking formal action isn't in the public interest. There are many  
2529 reasons why a young person may want to send a naked or semi-naked picture, video or message to  
2530 someone else:

2531 • joining in because they think that 'everyone is doing it'

2532 • boosting their self-esteem

2533 • flirting with others and testing their sexual identity

2534 • exploring their sexual feelings

2535 • to get attention and connect with new people on social media

2536 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person  
2537 asking is persistent

2538 9.63. The risks of sexting are that the young person has no control over the images and how these are shared,  
2539 and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide  
2540 education and guidance to prevent individuals from becoming victims of such situations by encouraging  
2541 them to think about the risk of sexting and understand how to seek help when approached to take part  
2542 in sexting. More information can be found on: [Keeping-children-safe/online-safety/sexting-sending-  
2543 nudes.](#)

#### 2544 **Online reputation**

2545 9.64. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed  
2546 by posts, photos that have been uploaded and comments made by others on people's profiles. It is  
2547 important that children/young people and staff are aware that anything that is posted could influence  
2548 their future professional reputation. The majority of organisations and work establishments now check  
2549 digital footprint before considering applications for positions or places on courses.

#### 2550 **Grooming**

2551 9.65. On-line grooming is the process by which one person with an inappropriate sexual interest in  
2552 children/young people will approach a child/young person on-line, with the intention of developing a



2553 relationship with that child/young person, to be able to meet them in person and intentionally cause  
2554 harm.

2555 9.66. The services will build awareness amongst children/young people, parents/carers and staff about  
2556 ensuring that the child/young person:

- 2557 • Only has friends on-line that they know in real life
- 2558 • Is aware that if they communicate with somebody that they have met on-line, that relationship should  
2559 stay on-line.

2560 9.67. Where appropriate that the services will support parents/carers to:

- 2561 • Recognise the signs of grooming
- 2562 • Have regular conversations with their children/young people about on-line activity and how to stay  
2563 safe on-line

2564 9.68. Where appropriate the services will raise awareness by:

- 2565 • Regular communication with the families
- 2566 • Schools/colleges will include awareness around grooming as part of their curriculum
- 2567 • Identifying with the families and children/young people how they can be safeguarded against  
2568 grooming.

2569 **Violence against women and girls (VAWG)**

2570 9.69. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women  
2571 and girls. The government has a strategy looking at specific issues that women and girls face.

2572 9.70. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to  
2573 equal participation of women and men in social, economic, and political spheres. Such violence impedes  
2574 gender equality and the achievement of a range of development outcomes. VAWG is a complex and  
2575 multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention  
2576 of and response to such violence require coordinated action across multiple sectors.  
2577

2578 **Female genital mutilation (FGM)**

2579 9.71. FGM comprises all procedures involving partial or total removal of the external female genitalia or other  
2580 injury to the female genital organs for non-medical reasons, hence interferes with the natural function of  
2581 girls' and women's bodies. It has no health benefits and harms girls and women in many ways.

2582 9.72. The age at which girls undergo FGM varies enormously according to the community in which they live.  
2583 The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before  
2584 marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place  
2585 between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

2586 9.73. In 2003 FGM became a criminal offence for UK nationals or permanent UK residents to take their child  
2587 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty  
2588 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2589 **Forced marriage**

2590 9.74. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses  
2591 cannot consent to the marriage and duress is involved. Duress can include physical, psychological,

2592 financial, sexual and emotional pressure.’ In developing countries approx. 11% of girls are married before  
2593 the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2594 9.75. It is important that all members of staff recognise the presenting symptoms, know how to respond if  
2595 there are concerns and where to turn for advice.

2596 9.76. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**  
2597 and locally through the local police safeguarding team or children’s social care.

2598 9.77. While all members of staff (education, care, clinical) have important responsibilities with regard to  
2599 children, young people or adults who may be at risk of forced marriage, managers and leaders should not  
2600 undertake roles in this regard that are most appropriately discharged by other children’s services  
2601 professionals such as police officers or social workers.

#### 2602 **Breast ironing**

2603 9.78. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's  
2604 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically  
2605 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and  
2606 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue  
2607 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where  
2608 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports  
2609 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used  
2610 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2611 9.79. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and  
2612 Safeguarding policy and the Individual offered medical help.

#### 2613 **Teenage relationship abuse**

2614 9.80. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such as  
2615 controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them  
2616 what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen  
2617 relationships.

2618 9.81. Further research shows that teenagers don’t understand what consent means within their relationships.  
2619 They often hold the common misconception that rape can only be committed by a stranger down a dark  
2620 alley and don’t understand that it could happen within their own relationships. This can lead to these  
2621 abusive behaviours feeling ‘normal’ and therefore unchallenged as they are not recognised as being  
2622 ‘abusive’.

2623 9.82. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their  
2624 own, their peers or others behaviour towards them. Therefore significant effort will be made to raise  
2625 awareness of it and respond effectively to such situations.

2626 9.83. In response to this Cambian Group will provide education and guidance to prevent teenagers from  
2627 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of  
2628 violence, abuse and controlling behaviours, and understand what consent means within relationships.

#### 2629 **Honour-based violence**

2630 9.84. It is often linked to family members or acquaintances who mistakenly believe someone has brought  
2631 shame to their family or community by doing something that is not in keeping with the traditional beliefs  
2632 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider  
2633 network of family or community pressure and can include multiple perpetrators. It is important to be

2634 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take”  
2635 for example, honour-based violence might be committed against individuals who:

- 2636 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2637 • want to get out of an arranged marriage
- 2638 • want to get out of a forced marriage
- 2639 • wear clothes or take part in activities that might not be considered traditional within a particular  
2640 culture.

2641 9.85. Girls and women are the most common victims of honour-based violence however it can also affect men  
2642 and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’  
2643 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced  
2644 marriage, being held against their will or taken somewhere they don’t want to go.

2645 9.86. If staff believe that the Individual is at risk from honour-based violence the DSL will follow the usual  
2646 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is  
2647 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on  
2648 teachers. It is important that if honour-based violence is known or suspected, communities and family  
2649 members must NOT be contacted prior to referral to the police or social care as this could increase the  
2650 risk to the individual.

#### 2651 **Preventing extremism and radicalisation**

2652 9.87. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism  
2653 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**  
2654 **Extremism and Radicalisation policy** and **0.27 E-safety policy** we all need to be vigilant in ensuring the  
2655 safety from extremist and terrorist material when accessing the internet. We take into account **Lancashire**  
2656 Local Authority Safeguarding Children’s Board arrangements to fulfil its Prevent duties.

2657 9.88. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other  
2658 forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’  
2659 safeguarding approach.

- 2660 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the  
2661 rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.  
2662 This also includes calling for the death of members of the armed forces.

- 2663 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist  
2664 ideologies associated with terrorist groups.

- 2665 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes  
2666 serious damage to property; or seriously interferes or disrupts an electronic system. The use or  
2667 threat **must** be designed to influence the government or to intimidate the public and is made  
2668 for the purpose of advancing a political, religious or ideological cause.

2669 9.89. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.  
2670 Background factors combined with specific influences such as family and friends may contribute to a  
2671 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social  
2672 media or the internet) and settings (such as within the home).

2673 9.90. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent  
2674 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to  
2675 changes in children’s behaviour, which could indicate that they may be in need of help or protection.

2676 Staff should use their judgement in identifying children who might be at risk of radicalisation and act  
2677 proportionately which may include making a Prevent referral.

2678 9.91. The school's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent  
2679 referral

2680 9.92. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act  
2681 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent  
2682 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2683 9.93. [An online general awareness training module on Channel is available](#). The module is suitable for school  
2684 staff and other front-line workers. It provides an introduction to the topics covered by this advice,  
2685 including how to identify factors that can make people vulnerable to radicalisation, and case studies  
2686 illustrating the types of intervention that may be appropriate, in addition to Channel.

#### 2687 **Prevent Duty**

2688 9.94. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs  
2689 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance:  
2690 for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and  
2691 also covers childcare). DSLs and other senior leaders in colleges should familiar themselves with the  
2692 [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out  
2693 in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

2694 9.95. Local authorities will be expected to ensure appropriate frontline staff, including those of it's contractors,  
2695 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism  
2696 and are aware of available programmes to deal with this issue.

2697 9.96. As the independent body responsible for standards and quality improvement for further education, the  
2698 Education and Training Foundation will work with the sector to ensure that appropriate training is  
2699 available. This will include and draw from training provided through the network of Prevent co-  
2700 ordinators.

#### 2701 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2702 9.97. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2703 9.98. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an  
2704 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity,  
2705 in exchange for something the victim needs or wants, and/or for the financial advantage or increased  
2706 status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can  
2707 affect children, both male and female and can include children who have been moved (commonly  
2708 referred to as trafficking) for the purpose of exploitation.

#### 2709 **Child Criminal Exploitation (CCE)**

2710 9.99. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or  
2711 money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be  
2712 forced or manipulated into committing vehicle crime or threatening/committing serious violence to  
2713 others. Children can become trapped by this type of exploitation as perpetrators can threaten victims  
2714 (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying  
2715 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As  
2716 children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims  
2717 is not always recognised by adults and professionals, (particularly older children), and they are not  
2718 treated as victims despite the harm they have experienced. They may still have been criminally exploited  
2719 even if the activity appears to be something they have agreed or consented to.

2720 9.100. It is important to note that the experience of girls who are criminally exploited can be very different to  
2721 that of boys. The indicators may not be the same, however professionals should be aware that girls are

2722 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally  
2723 exploited may be at higher risk of sexual exploitation.

2724 **Child Sexual Exploitation (CSE)**

2725 9.101. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by  
2726 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing,  
2727 and touching outside clothing. It may include noncontact activities, such as involving children in the  
2728 production of sexual images, forcing children to look at sexual images or watch sexual activities,  
2729 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for  
2730 abuse including via the internet.

2731 9.102. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate  
2732 knowledge e.g. through others sharing videos or images of them on social media.

2733 9.103. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17  
2734 year olds who can legally consent to have sex. Some children may not realise they are being exploited  
2735 e.g. they believe they are in a genuine romantic relationship

2736 9.104. Children with learning difficulties can be particularly vulnerable to exploitation as can children from  
2737 particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual  
2738 emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who  
2739 go missing from home or school, children involved in crime, children with parents/carers who have  
2740 mental health problems, learning difficulties/other issues, children who associate with other children  
2741 involved in exploitation. However, it is important to recognise that any child can be targeted.

2742 9.105. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors  
2743 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or  
2744 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants  
2745 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or  
2746 facilitator.

2747 9.106. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of  
2748 18 years, including 16 and 17 year olds who can legally consent to have sex) or adults. It is critical to know  
2749 that children/young people may also be exploited by other children/young people, who themselves may  
2750 be experiencing exploitation – where this is the case, it is important that the child/young person  
2751 perpetrator is also recognised as a victim.

2752 9.107. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic  
2753 to complex organised abuse. It can involve force and/or enticement-based methods of compliance and  
2754 may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when  
2755 activity appears consensual and it should be noted exploitation as well as being physical can be facilitated  
2756 and/or take place online. More information include definitions and indicators are included in - [KCSIE2021](#)

2757 - Part One. Some of the following can be indicators of both child criminal and sexual exploitation where  
2758 children:

- 2759 • appear with unexplained gifts or new professions;
- 2760 • associate with other young people involved in exploitation;
- 2761 • suffer from changes in emotional well-being;
- 2762 • misuse drugs and alcohol;
- 2763 • go missing for periods of time or regularly or come home late; and
- 2764 • regularly miss school or education or do not take part in education.

2765

2766 9.108. Some additional specific indicators that may be present in CSE and children who:

- 2767 • Children who have older boyfriends or girlfriends; and
- 2768 • Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected  
2769 sexual development or or become pregnant.

2770 9.109. Further information on signs of a child's involvement in sexual exploitation is available in Home Office  
2771 guidance: Child sexual exploitation: guide for practitioners.

2772 9.110. As an organisation we do recognise that the same level of exploitation may take place involving  
2773 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18  
2774 years or over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act  
2775 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that  
2776 the above statement will equally apply to those who are 18+ across England and Wales.

2777 9.111. Children under the age of criminal responsibility (under the age of 10), or young people who have  
2778 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal  
2779 activity provide opportunity for criminals to distance themselves from crime.

## 2780 **County Lines**

2781 9.112. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal  
2782 drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as  
2783 well as across the UK - no specified distance of travel is required. Children and vulnerable adults are  
2784 exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation,  
2785 violence (including sexual violence) and weapons to ensure compliance of victims. Children can be  
2786 targeted and recruited. Exploitation is an integral part of the county lines, children may become victims  
2787 through: coercion, intimidation, violence (including sexual) and weapons.

2788 9.113. Children can be targeted and recruited into county lines in a number of locations including schools,  
2789 further and higher educational institutions, pupil referral units, special educational needs schools,  
2790 children's homes and care homes. Children are often recruited to move drugs and money between  
2791 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed  
2792 internally to avoid detection. Children can easily become trapped by this type of exploitation as county  
2793 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their  
2794 families) if they attempt to leave the county lines network.

2795 9.114. Children are also increasingly being targeted and recruited online using social media. Children can easily  
2796 become trapped by this type of exploitation as county lines gangs can manufacture drug debts which  
2797 need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they  
2798 attempt to leave the county lines network. These children and young people are at serious risk of  
2799 criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not

2800 necessarily be affiliated to a gang, but who have developed networks across geographical boundaries to  
2801 access and exploit existing drugs markets in these areas.

2802 9.115. The group, or individuals exploited by them, travel regularly between the urban hub and the rural  
2803 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply  
2804 but is generally more frequent and in smaller deal amounts compared to most other drug supply  
2805 methods.

2806 9.116. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are  
2807 involved in county lines. Some additional specific indicators that may be present where a child is  
2808 criminally exploited through involvement in county lines are children who:

- 2809 • go missing and are subsequently found in areas away from their home;
- 2810 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2811 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and  
2812 collecting money for drugs;
- 2813 • are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid  
2814 detection;
- 2815 • are found in accommodation that they have no connection with, often called a ‘trap house or  
2816 cuckooing’ or hotel room where there is drug activity;
- 2817 • owe a ‘debt bond’ to their exploiters;
- 2818 • have their bank accounts used to facilitate drug dealing.

2819 9.117. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be  
2820 considered alongside consideration of availability of local services/third sector providers who offer  
2821 support to victims of county lines exploitation.

2822 **Cuckooing**

2823 9.118. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation  
2824 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to  
2825 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to as  
2826 cuckooing.

2827 9.119. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to  
2828 use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

2829 in the South of England. The crime is named for the cuckoo's practice of taking over other birds' nests for  
2830 its young.

2831 9.120. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

2832 9.121. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally  
2833 exploited include:

2834       ▪ Increase in missing episodes (Education and/or Care) – particular key as children/young people can  
2835       be missing for days and drug run in other counties

2836       ▪ Having unexplained amounts of money, new high cost items and multiple mobile phones

2837       ▪ Increased social media and phone/text use, almost always secretly

2838       ▪ Older males in particular seen to be hanging around and driving

2839       ▪ Having injuries that are unexplained and unwilling to be looked at

2840       ▪ Increase in aggression, violence and fighting

2841       ▪ Carrying weapons – knives, baseball bats, hammers, acid

2842       ▪ Travel receipts that are unexplained

2843       ▪ Significant missing cases from education and disengaging from previous positive peer groups

2844       ▪ Parents/carers concerns and significant changes in behaviour that affect emotional wellbeing

2845 9.122. We will treat any child/young person who may be criminally exploited as a victim in the first instance and  
2846 refer to the Local Safeguarding Authority in the first instance. If a referral to the police is also required as  
2847 crimes have been committed on the school premises, these will also be made.

2848 **Knife crime**

2849 9.123. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes  
2850 references to both; to the use of knives against children either to threaten or to wound them and to  
2851 instances when children may have been carrying or using knives for a range of purposes.

2852 9.124. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and  
2853 knife-carrying. However, there are many different criminal offences relating to knives. For example:

2854       • it is an offence to threaten or cause harm to a person with a bladed weapon

2855       • some bladed weapons are prohibited from being sold or purchased, including to anyone  
2856       under the age of 18

2857       • offences such as robbery or assault can be aggravated if a knife is involved

2858       • it is also an offence to carry a knife in a public place without good reason.

2859       • It is clear that knife crime is an increasing safeguarding risk to children and young people,  
2860       both at school and in their local communities. While Ofsted have not sought to answer the  
2861       question of the causes of knife crime, leaders told Ofsted that, in their experience, children  
2862       are in three categories of risk of knife-carrying.

2863 9.125. The highest level of risk is for those children who have been groomed into gangs, for the purposes of  
2864 criminal exploitation.

2865 9.126. Underneath this lies a group of children who have witnessed other children carrying knives, have been  
2866 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or



2867 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on  
2868 social media.

2869 9.127. Then there are children who carry knives to school as an isolated incident. For example, they may carry  
2870 a penknife that a grandparent has gifted them

2871 9.128. It is important to remember that knife crime does not exist in a vacuum and children who are victims or  
2872 perpetrators may also be experiencing multiple vulnerabilities.

2873 9.129. Some children and young people can be more at risk of being drawn into criminality, multiple studies  
2874 demonstrate a clear link between inequality and high rates of violence for example. There is a need to  
2875 both understand and address individual risk factors as well as address the social challenges that underpin  
2876 criminal exploitation and serious violence in our communities, from poor mental health, addiction,  
2877 poverty, unemployment and poor-quality housing.

2878 **Missing young people and the link between missing and county lines**

2879 9.130. Every precaution is taken through the use of risk assessments and thorough planning and supervision to  
2880 ensure that children, young people and young adults are safe both at school, college, home, and on  
2881 outings. If a child, young person or young adult goes missing from our Location it is considered a potential  
2882 indicator of abuse or neglect.

2883 9.131. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of  
2884 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to attend  
2885 school regularly or has been absent without the school's permission for a continuous period of 10 days  
2886 or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs  
2887 such as travelling to conflict zones, FGM and forced marriage.

2888 9.132. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them  
2889 towards going missing and becoming involved in criminal activities. Some individuals may be pulled  
2890 towards exploitation through the promise of money, gifts, affection and status. However, they may be  
2891 then be forced to work for these people as they are coerced into believing that they are indebted to  
2892 them.

2893 **Domestic abuse**

2894 9.133. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever  
2895 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as  
2896 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of  
2897 domestic abuse, based on the previous cross-government definition, ensures that different types of  
2898 relationships are captured, including ex-partners and family members. The definition captures a range of  
2899 different abusive behaviours, including physical, emotional and economic abuse and coercive and  
2900 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the  
2901 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as  
2902 defined in section 2 of the 2021 Act).

2903 9.134. Types of domestic abuse include intimate partner violence, abuse by family members, teenage  
2904 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of  
2905 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and  
2906 domestic abuse can take place inside or outside of the home. The government will issue statutory  
2907 guidance to provide further information for those working with domestic abuse victims and perpetrators,  
2908 including the impact on children.

2909 9.135. All children can witness and be adversely affected by domestic abuse in the context of their home life  
2910 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence  
2911 can have a serious, long lasting emotional and psychological impact on children. In some cases, a child  
2912 may blame themselves for the abuse or may have had to leave the family home as a result.

2913 9.136. Young people can also experience domestic abuse within their own intimate relationships. This form of  
2914 peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of  
2915 the young people, this may not be recognised in law under the statutory definition of 'domestic abuse'

2916 (if one or both parties are under 16). However, as with any child under 18, where there are concerns  
2917 about safety or welfare, child safeguarding procedures should be followed and both young victims and  
2918 young perpetrators should be offered support. The Act's provisions, including the new definition, will be  
2919 commenced over the coming months.

2920 9.137. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work  
2921 together to provide emotional and practical help to children. The system ensures that when police are  
2922 called to an incident of domestic abuse, where there are children in the household who have experienced  
2923 the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or  
2924 children arrive at school the following day. This ensures that the school has up to date relevant  
2925 information about the child's circumstances and can enable immediate support to be put in place,  
2926 according to the child's needs. Operation Encompass does not replace statutory safeguarding  
2927 procedures. Where appropriate, the police and/or schools should make a referral to children's social care  
2928 if they are concerned about a child's welfare. More information about the scheme and how schools can  
2929 become involved is available on the Operation Encompass website.

2930 9.138. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence,  
2931 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well  
2932 as those who are worried about friends and loved ones. It also has a form through which a safe time from  
2933 the team for a call can be booked. Additional advice on identifying children who are affected by domestic  
2934 abuse and how they can be helped is available at:

- 2935 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 2936 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 2937 • [SafLives: young people and domestic abuse.](#)
- 2938 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes  
2939 information for adult victims, young people facing abuse in their own relationships and  
2940 parents experiencing child to parent violence/abuse)
- 2941 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic  
2942 abuse on children)

#### 2943 **Serious Violent Crime**

2944 9.139. All staff should be aware of indicators, which may signal that children are at risk from, or are involved  
2945 with serious violent crime. These may include:

- 2946 • increased absence from school with a significant decline in performance,
- 2947 • a change in friendships or relationships with older individuals or group,
- 2948 • signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries,
- 2949 • unexplained gifts or new possessions could also indicate that children have been approached by, or  
2950 are involved with individuals associated with criminal networks or gangs.

2951 9.140. All staff should be aware of the associated risks and understand the measures in place to measure these.  
2952 Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang

2953 involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance -](#)  
2954 [September 2018](#).

2955 **Mental Health**

2956 9.141. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing  
2957 of young people. All staff should be aware that mental health problems can, in some cases, be an indicator  
2958 that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

2959 9.142. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying  
2960 possible mental health problems, including routes to escalate and clear referral and accountability  
2961 systems.

2962 9.143. The Department is providing funding to support costs of a significant training program for senior mental  
2963 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be  
2964 available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school  
2965 or college approach to mental health.

2966 9.144. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.  
2967 Staff however, are well placed to observe children day-to-day and identify those whose behaviour  
2968 suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff  
2969 suspect this might be the case they should report their concerns to a senior leader within the school and  
2970 if possible bring their concerns to a member of the clinical team.

2971 9.145. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood  
2972 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is  
2973 key that staff receive appropriate education and training so that they are aware of how these children's  
2974 experiences, can impact on their mental health, behaviour and education.

2975 9.146. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action  
2976 should be taken. Staff should follow their child protection policy and speak immediately to the DSL or a  
2977 deputy.

2978 9.147. Schools and colleges can access a range of advice to help them identify children in need of extra mental  
2979 health support, this includes working with external agencies. More information can be found in the  
2980 [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best  
2981 practice. Public Health England has produced a range of resources to support secondary school teachers  
2982 to promote positive health, wellbeing and resilience among children.

2983 9.148. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful  
2984 for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools  
2985 and colleges can help prevent mental health problems by promoting resilience as part of an integrated,  
2986 whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their  
2987 pupils.

2988 9.149. In addition, Public Health England has produced a range of resources to support secondary schools to  
2989 promote positive health, wellbeing and resilience among children including its guidance Promoting  
2990 children and young people's emotional health and wellbeing. Its resources include social media, forming  
2991 positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The  
2992 Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff  
2993 with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our

2994 [Wellbeing for education recovery program](#) content, which covers issues such as bereavement, loss,  
2995 anxiety, stress and trauma.

2996 **Human trafficking**

2997 9.150. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process  
2998 that is a combination of:

- 2999 - Movement (including within the UK);
- 3000 - Control, through harm / threat of harm or fraud
- 3001 - For the purpose of exploitation

3002 9.151. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming  
3003 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a  
3004 life of abuse, servitude and inhumane treatment.

3005 9.152. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is  
3006 significant evidence that children/young people/young adults (both of UK and other citizenship) are being  
3007 trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

3008 9.153. There are a number of indicators which suggest that a child/young person/young adult may have been  
3009 trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as  
3010 follows:

- 3011 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has  
3012 an unwanted pregnancy
- 3013 - Has a history with missing links and unexplained moves
- 3014 - Is required to earn a minimum amount of money every day
- 3015 - Works in various locations
- 3016 - Has limited freedom of movement
- 3017 - Appears to be missing for periods
- 3018 - Is known to beg for money
- 3019 - Is being cared for by adult/s who are not their parents and the quality of the relationship between  
3020 the child and their adult carers is not good
- 3021 - Is one among a number of unrelated children found at one address
- 3022 - Has not been registered with or attended a GP practice
- 3023 - Is excessively afraid of being deported.

3024 9.154. For those children/young people/young adults who are internally trafficked within the UK indicators  
3025 include:

- 3026 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3027 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3028 - Reports from reliable sources suggesting the likelihood of involvement in
- 3029 - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- 3030 - Evidence of drug, alcohol or substance misuse

- 3031 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing  
3032 from older people
- 3033 - Relationship with a significantly older partner
- 3034 - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible  
3035 explanation of the source of necessary funding
- 3036 - Persistently missing, staying out overnight or returning late with no plausible explanation
- 3037 - Returning after having been missing, looking well cared for despite having not been at home
- 3038 - Having keys to premises other than those known about
- 3039 - Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating  
3040 disorder, promiscuity
- 3041 - Truancy / disengagement with education
- 3042 - Entering or leaving vehicles driven by unknown adults
- 3043 - Going missing and being found in areas where the child/young person/young adult has no known  
3044 links; and/or
- 3045 - Possible inappropriate use of the internet and forming on-line relationships, particularly with  
3046 adults/other adults.
- 3047 9.155. These behaviours themselves do not indicate that an Individual is being trafficked, but should be  
3048 considered as indicators that this may be the case.

3049 **Modern slavery and the National Referral Mechanism**

- 3050 9.156. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.  
3051 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced  
3052 criminality and the removal of organs.
- 3053 9.157. When considering modern slavery, there is a perception that this is taking place overseas. The  
3054 government estimates that tens of thousands of slaves are in the UK today.
- 3055 9.158. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,  
3056 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from  
3057 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been  
3058 rescued within the UK.
- 3059 9.159. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be  
3060 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.
- 3061 9.160. Further information on the signs that someone may be a victim of modern slavery, the support available  
3062 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.  
3063 Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

3064 **Cybercrime**

- 3065 9.161. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised  
3066 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line)

3067 or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes  
3068 include:

3069 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer  
3070 network to look for test paper answers or change grades awarded;

3071 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,  
3072 network or website unavailable by overwhelming it with internet traffic from multiple sources;  
3073 and

3074 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,  
3075 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,  
3076 including those above.

3077 9.162. Children with particular skill and interest in computing and technology may inadvertently or  
3078 deliberately stray into cyber-dependent crime.

3079 9.163. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the  
3080 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and  
3081 led by the National Crime Agency, working with regional and local policing. It aims to intervene where  
3082 young people are at risk of committing, or being drawn into, low level cyber-dependent offences and  
3083 divert them to a more positive use of their skills and interests.

3084 9.164. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of  
3085 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line  
3086 bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to](#)  
3087 [call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

3088 **Initiation/Hazing**

3089 9.165. Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a  
3090 private school, sports team etc. There are a number of different forms, from relatively mild rituals to  
3091 severe and sometimes violent ceremonies in gangs/criminal groups.

3092 9.166. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which  
3093 promote a bond between them. After the hazing is over, the newcomers also have something in common  
3094 with older members of the organisation, because they all experienced it as part of a rite of passage. Many  
3095 rituals involve humiliation, embarrassment, abuse, and harassment.

3096 9.167. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour  
3097 and raise awareness of such within all services.  
3098

3099 **Safeguarding issues relating to Individual children and young people needs**

3100 **Homelessness**

3101 9.168. As an organisation we recognise that being homeless or being at risk of becoming homeless presents a  
3102 real risk to a child's/young person welfare. The impact of losing a place of safety and security can affect  
3103 an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress  
3104 concerns at the earliest opportunity.

3105 9.169. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing  
3106 Authority for the parent/guardians in order to raise/progress concerns.

3107 9.170. In most cases school and college colleagues will be considering homelessness in the context of children  
3108 who live with their families, and intervention will be on that basis. However, it should also be recognised  
3109 in some cases 16 and 17 year olds could be living independently from their parents or guardians, for  
3110 example through their exclusion from the family home, or other reasons. This will require a different level  
3111 of intervention and support. Children's services will be the lead agency for these young people and the  
3112 DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The

3113 department and the Ministry of Housing, Communities and Local Government have published joint  
3114 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless  
3115 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3116 9.171. Guidance on how local authorities should exercise their homelessness functions in accordance with the  
3117 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local](#)  
3118 [authorities](#).

3119 9.172. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young  
3120 people and the DSL should ensure appropriate referrals are made based on the Individual's  
3121 circumstances.

3122 9.173. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be  
3123 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding  
3124 Authority where an Individual has been harmed or is at risk of harm.

### 3125 **Private Fostering**

3126 9.174. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be  
3127 cared for by another adult who is not closely related and is not a legal guardian with parental  
3128 responsibility for 28 days or more.

3129 9.175. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,  
3130 uncle or aunt.

3131 9.176. The Law requires that the carers and parents must notify the Children's Services Department of any  
3132 private fostering arrangement.

3133 9.177. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is  
3134 being privately fostered they will inform the Children's Services Department and inform both the parents  
3135 and carers that they have done so.

### 3136 **Child and the Court System**

3137 9.178. As an organisation we recognise that children/young people are sometimes required to give evidence in  
3138 criminal courts, either for crimes committed against them or for crimes they have witnessed. We know  
3139 that this can be a stressful experience and therefore services across the organisation will aim to support  
3140 children through this process.

3141 9.179. Along with information, advice and guidance, services will use age-appropriate materials published by  
3142 HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means  
3143 to be a witness, how to give evidence and the special measures which are in place to assist such as using  
3144 a live link/aids to communicate and video links.

3145 9.180. We recognise that making child arrangements via the family courts following separation can be stressful  
3146 and entrench conflict in families. This can be very stressful for children. Services will support  
3147 children/young people going through this process.

3148 9.181. Alongside information, advice and guidance services will use online materials published by The Ministry  
3149 of Justice (2018) which offers children/young people information & advice on the dispute resolution

3150 service - [Get help with child arrangements](#). These materials will also be offered to parents and carers if  
3151 appropriate.

3152 9.182. Ensure that children/young people are sufficiently supported where a parent has been sent to prison,  
3153 adequate support includes protection from: stigma, isolation and poor mental health.

3154 **Fabricated or induced illnesses (FII)**

3155 9.183. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually  
3156 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3157 9.184. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's  
3158 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3159 9.185. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This  
3160 ranges from extreme neglect (failing to seek medical care) to induced illness.

3161 9.186. Behaviours in FII include a parent/carer who:

- 3162 - persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3163 - exaggerates or lies about their child's symptoms,
- 3164 - manipulates test results to suggest the presence of illness – for example, by putting glucose in urine  
3165 samples to suggest the child has diabetes,
- 3166 - deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary  
3167 medication or other substances.

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