

Policy and Procedure on Child Protection and Safeguarding – children’s services

Potterspurty Lodge School and Children’s Home

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93 1. Monitoring and review

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

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

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

100

101 Signed:




Jeremy Wiles
Group Executive Director- Children's Services
Date: August 2023

Sarah Stacey
Principal
Date: August 2023

102

103 2. Terminology

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

'Establishment' or 'Location'	This is a generic term, which means the Children's Home/school/college.
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Potterspurty Lodge School and Children's Home we have children and young pupils/students residing at and attending our school and children's home between the ages of 8-18.
Head of Service	This is the senior person with overall responsibility for the school and home. At Potterspurty Lodge School and Children's Home this is Sarah Stacey – Principal.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	Means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	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.
Safeguarding Authority	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
LADO	Local Authority Designated Officer
DSL/DSL Deputy	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service

Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
Cambian KPI	The online in-house information system, which holds data for each site on quality measures.

106

107

108 3. Definitions and age-related arrangements

109 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies
 110 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2023)
 111 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)
 112 Act 2021.

113 3.2. **Adults are over the age of 18.** Over 18-year olds are covered by the Local Safeguarding Adult Boards
 114 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse
 115 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect;
 116 and as a result of their particular care and support needs, is unable to protect themselves from either
 117 the risk of, or the experience of abuse or neglect’. We refer to adult service users in our provision as
 118 **young adults** due to the fact we provide children’s services up to the age of 25.

119 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the
 120 legal framework for social service provision in Wales. It sets out what must and should be done to
 121 safeguard children and adults. At a local level regional safeguarding children’s boards co-ordinate
 122 and ensure the effectiveness of work to protect and promote the welfare of children.

123 3.4. Staff working with young adults aged 18 and over, who receive education, care and support from our
 124 children’s services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional
 125 Safeguarding Children’s Boards depending on local arrangements.

126 3.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who
 127 attend a day or residential school or college – this might be 38- or 52-weeks’ provision. Some children
 128 attending school or college live in children’s homes or care homes across England and Wales, hence
 129 the reason why this policy and procedure is more comprehensive than that of a traditional day school
 130 or college. Our safeguarding responsibility extends beyond day education and often covers 24hrs
 131 services regulated by various regulators across the UK.

132 3.6. Where we make references to schools and colleges, this also includes associated children’s or care
 133 homes in which children/young people live. Where we make references to children’s or care homes,
 134 those cover all children’s/care homes including those within the children’s residential care division.

135 **Multi agency working – Safeguarding Partners & Children’s Social Care**

136 3.7. Children’s Social Care - provide support to children in need of help and protection, including children
 137 with disabilities. Services include statutory assessment and care planning for children at risk of
 138 significant harm, provision for cared for children and care experienced young people, as well as
 139 fostering and adoption services.

140 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements.
 141 Governance boards and proprietor should ensure that the school or college contributes to multi-agency
 142 working in line with statutory guidance [Working Together to Safeguard Children](#).

143 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area
 144 within the local authority and the chief officer of police for an area (any part of which falls)) within the

- 145 local authority work together with appropriate relevant agencies to safeguard and promote the welfare
146 of local children, including identifying and responding to their needs.
- 147 3.10. It is especially important that schools and colleges understand their role in the three safeguarding
148 partner arrangements. Governance boards, proprietor and their senior leadership teams, especially
149 their DSLs, should make themselves aware of and follow their local arrangements.
- 150 3.11. The three safeguarding partners should allow all schools and colleges in the local area to be fully
151 engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three
152 safeguarding partners will name schools and colleges as relevant agencies and will reach their own

153 conclusions on the best way to achieve the active engagement with individual institutions in a
154 meaningful way.

155 Child protection definition

156 3.12. Child protection is part of the safeguarding process. It focuses on protecting individual children
157 identified as suffering or likely to suffer significant harm. This includes child protection procedures,
158 which detail how to respond to concerns about a child.

159 Safeguarding definition – Working together to safeguard children 2018

160 3.13. **Safeguarding children and young people** is the action taken to promote the welfare of children and
161 protect them from harm. It means:

- 162 • Protecting children from abuse and maltreatment,
- 163 • Preventing harm to children’s health or development,
- 164 • Ensuring children grow up with the provision of safe and effective care,
- 165 • Acting to enable all children and young people to have the best outcomes.

166 Safeguarding definition – Keeping Children Safe in Education 2023

167 3.14. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes
168 into contact with children and their families has a role to play. In order to fulfil this responsibility

169 3.15. effectively, all practitioners should make sure their approach is child-centred. This means that they
170 should consider, at all times, what is in the best interests of the child.

171 3.16. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 172 • Protecting children from maltreatment,
- 173 • Preventing impairment of children’s mental and physical health or development,
- 174 • Ensuring that children grow up in circumstances consistent with the provision of
175 safe and effective care, and
- 176 • Acting to enable all children to have the best outcomes.

177 Safeguarding Adults

178 3.17. Safeguarding adults means protecting an adult’s right to live in safety, free from abuse and neglect.
179 It is about people and organisations working together to prevent and stop both the risks and experience of
180 abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where
181 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

182 3.18. The statutory guidance enshrines the **six principles** of adults safeguarding:
183

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

191 3.19. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and
192 procedures, which apply to its Adults’ Services. Both policies can be accessed via Rezume. Services

193 operating in Wales can find their Safeguarding Regional Boards via this hyperlink, which provides
194 access to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

195 **The difference between safeguarding and child protection**

196 3.20. In relation to children's services - in practice safeguarding is the policies and practices that
197 schools/colleges/children's homes employ to keep children safe and promote their well-being. This
198 means everything from security of the buildings, to the safe recruitment of staff and everything in
199 between. **Appendix 10.** illustrates safeguarding in children's services.

200 **Abuse and neglect – child and young person context**

201 3.21. In the context of a child/young person, abuse and neglect are forms of maltreatment. Somebody may
202 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.
203 Children/young people may be abused in a family or in an institutional or community setting, by those
204 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another
205 child/young person or children/young people.

206 3.22. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of
207 these. The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse -**
208 **children.** The signs that someone could be a victim or an abuser have been explored in **Appendix 6**
209 and **Appendix 7.** Parents, carers and other people can harm children and young people by direct acts
210 and/or failure to provide proper care. It should also be understood that children can also be abused
211 by being sexually exploited, or subject to honour-based abuse, domestic violence, forced marriage,
212 female genital mutilation and through online social media. See **Appendix 12 - Further safeguarding**
213 **information – what everyone needs to know.**

214 3.23. In the context of an adult, abuse is a violation of a person's human and civil rights by another person
215 or persons and may result in significant harm to, or the exploitation of, the person subjected to it.

216 3.24. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children,** there are other
217 forms of abuse in relation to adults explained in more detail in **Appendix 5 – Types of abuse – Adults.**

218 3.25. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in
219 a care home, school or in a college. It can happen when someone lives alone or with others. Anyone
220 can carry out abuse or neglect. Abuse can be intentional or unintentional; it may be a single act or
221 repeated acts.

222 **4. Purpose**

223 4.1. As an organisation, we have a clear set of guidelines to make sure we deal with child protection and
224 safeguarding concerns effectively.

225 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance,** and it complies
226 with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information**
227 **Poster.** This policy complies with West Northamptonshire's locally agreed procedures. Printed or
228 electronic copies of the Local Safeguarding Children's Partnerships (LSCP), Local Safeguarding Adults
229 Board (LSAB) or Regional Safeguarding Children's Boards (Wales) procedures are available in every
230 setting.

231 4.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with
232 the requirements of the local authority in which the establishment is situated.

233 4.4. This policy, and supporting information in various accessible forms, is made available to all individuals,
234 staff and parents associated with Cambian Potterspurty Lodge School and Children's Home to ensure

235 that everyone is clear on procedures for ensuring the protection of children and safeguarding children
236 and young adults.

237 4.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11.**
238 **Staff Code of Practice and GHR 37. Code of Conduct.**

239 4.6. In addition, staff should be aware of and have access to the NSPCC whistle-blowing helpline number
240 **0800 028 0285** and the Cambian Whistleblowing service operated by EthicsPoint on **0800 086 9128**.
241 More information about EthicsPoint and how it can be contacted can be found in the Whistleblowing
242 policy.

243 4.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to support
244 school and college staff with when it is appropriate to contact the police.

245 4.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer
246 from harm, it is important that a referral to children’s social care (and if appropriate the police) is made
247 immediately. Referrals should follow the local referral process.

248 5. Policy

249 **Safeguarding culture of the organisation**

250 5.1. Cambian safeguarding culture can be best described as:

251 - **Proactive**, being professionally curious to determine further information in the interests of the
252 child. It is essential that staff exercise professional curiosity at all times, as it is likely that signs
253 of any form of abuse including neglect will be identified when dealing with an un-associated
254 incident. Having strong governance and leadership, raising awareness through and

- 255 enhancing children’s and young people’s capacity around the risks and their own safety,
256 regular reflective supervision).
- 257 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other
258 professionals in timely manner, active listening, applying theory in practice in a methodical
259 way).
- 260 - **Reflective** (understanding ‘how we got there in the first place’, completing a reflective account
261 of events, involving other key professionals in future planning, identifying actions and further
262 changes to be made).
- 263 5.2. Child protection and safeguarding is everyone’s responsibility. Everyone working for or visiting our
264 locations has a responsibility to understand and implement this policy and procedure at all times.
- 265 5.3. All individuals in our services have a right to feel safe, secure and be protected from harm.
- 266 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
267 individuals with special educational needs (SEN) and disabilities:
- 268 • Are more likely to be abused or neglected;
 - 269 • May display behaviour, mood and/or injury, which may relate to possible abuse and not
270 just their SEN or a particular disability.
 - 271 • Have a higher risk of peer group isolation.
 - 272 • Can be disproportionally impacted by things like bullying without outwardly showing any
273 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
276 abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep
277 children and young 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
279 or disclosure that may indicate an individual is at risk of harm, either in the school, college, and care
280 home or in the community, taking into account contextual safeguarding, see **Appendix 12 - 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
286 individuals and reduces risk and so we will engage in partnership, working throughout the child
287 protection process to safeguard children and will equally work through safeguarding adults’
288 procedures as directed by local 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.

Divisional Safeguarding Board

- 292 5.10. As an organisation Caretech children’s services operates three Divisional Safeguarding Boards:
293 Education, Residential Care and Fostering. The main purpose of each board is to ensure that all
294 services across all divisions discharge their responsibilities effectively for assuring safe and secure
295 services for children and young people, and manage all safeguarding risks appropriately within its
296 own workforce, including direct employees and also the contracted workforce (supply

297 workers/agency/contractor and subcontractors). The full terms of reference for each Board is available
298 on [Cambian Point](#).

299 What staff should read and be aware of

300 5.11. On the 1st September 2023 Keeping Children Safe in Education (2023) guidance replaced Keeping
301 Children Safe in Education 2022. It is essential that everybody working in a school or college
302 understands their safeguarding responsibilities. Staff who work directly with children read at least [Part](#)
303 [one](#) of this guidance. Governance Boards and proprietor (or those acting on their behalf) working with
304 their senior leadership teams and especially their designated safeguarding lead, should ensure that
305 those staff who do not work directly with children read either Part one or [Annex A](#) (a condensed version
306 of Part one) of this guidance.

307 5.12. The guidance should be read alongside:

- 308 • statutory guidance - [Working Together to Safeguard Children](#)
- 309 • departmental advice - [What to do if you are Worried a Child is Being Abused -](#)
310 [Advice for Practitioners](#) ;

311 5.13. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan
312 how the learning from KCSIE2023 will take place with their staff. School /college's SLT should ensure
313 that staff complete the KCSIE2023 knowledge check.

314 5.14. All staff should be aware of systems within their school or college, which support safeguarding, and
315 these should be explained to them as part of staff induction. This should include the:

- 316 - Child protection and safeguarding policy
- 317 - Behaviour Support policy
- 318 - Anti bullying policy
- 319 - Whistleblowing policy, Code of conduct and Code of Practice policy
- 320 - Missing from Care policy, local procedure for children missing from education
- 321 - Role of the DSL (including the identity of the DSL and any deputies)
- 322 - Have Access to policies and a copy of Part one of KCSIE2023
- 323 - All staff should be aware of their local early help process and understand their role in it, more
324 information can be found in [Working Together to Safeguard Children 2018](#)
325 [\(publishing.service.gov.uk\)](#).

326 5.15. All staff should be aware of the process for making referrals to children's social care and for statutory
327 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a
328 child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they
329 might be expected to play in such assessments.

330 5.16. Schools concerned about a child's/young person's welfare should refer their concern to local authority
331 children's social care where the school is located. If the child is placed at the school by a different LA
332 then the school will need to inform that LA as well. Where a child is suffering, or is likely to suffer from
333 harm, it is important that a referral to children's social care (and if appropriate the police) is made
334 immediately. Referrals should follow the local referral process. Children's homes/care homes should
335 follow their referral process as per their local procedure and contact Safeguarding
336 Partner/Safeguarding Board as per their local Safeguarding procedure.

337 5.17. All staff should know what to do if a child/young person/young adult tells them he/she is being
338 abused, exploited or neglected. Staff should know how to manage the requirement to maintain an
339 appropriate level of confidentiality. This means only involving those who need to be involved, such as
340 the DSL (or a deputy) and children's social care. Staff should never promise a child that they would not
341 tell anyone about a report of any form of abuse, as this might ultimately not be in the best interests of
342 the child.

343 5.18. All staff should be able to reassure victims that they are being taken seriously and that they will be
344 supported and kept safe. A victim should never be given the impression that they are creating a

345 problem by reporting any form of abuse including sexual violence and sexual harassment. Nor should
346 a victim ever be made to feel ashamed for making a report.

347 5.19. It is important to explain that the law is in place to protect children and young people rather than
348 criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

349 5.20. All staff should be aware that children may not feel ready or know how to tell someone that they are
350 being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.
351 For example, children may feel embarrassed, humiliated, or being threatened. This could be due to
352 their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent
353 staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
354 It is also important that staff determine how best to build trusted relationships with children and young
355 people which facilitate communication.

356 5.21. Staff should **not** assume a colleague, or another professional will act and share information that might
357 be critical in keeping children safe. They should be mindful that early information sharing is vital for the
358 effective identification, assessment, and allocation of appropriate service provision, whether this is
359 when problems first emerge, or where a child is already known to local authority children's social care
360 (such as a child in need or a child with a protection plan).

361 Whole service approach to safeguarding

362 5.22. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school
363 or college approach to safeguarding. This means ensuring safeguarding and child protection are at
364 the forefront and underpin all relevant aspects of process and policy development. Ultimately, all
365 systems, processes and policies should operate with the best interests of the child at their heart.

366 5.23. Where there is a safeguarding concern, the child's wishes and feelings must be considered when
367 determining what action to take and what services to provide. Systems should be in place, and they
368 should be well promoted, easily understood and easily accessible for children to confidently report
369 abuse, knowing their concerns will be treated seriously, and knowing they can safely express their
370 views and give feedback.

371 Children with special educational needs and disabilities or physical health issues

372 5.24. Children with special educational needs or disabilities (SEND) or certain health conditions can face
373 additional safeguarding challenges. There might be some additional barriers when recognising abuse
374 and neglect in this group of children. These can include:

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

383 5.25. SEN division and other services where children have/may have SEND should consider extra pastoral
384 support and attention for these children, along with ensuring any appropriate support for
385 communication is in place. Further information can be found in the Department's: [SEND Code of
386 Practice 0 to 25 and Supporting Pupils at School with Medical Conditions](#).

387 Virtual school heads

388 5.26. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and
389 academies, the designated teacher should work with the virtual school head to discuss how funding
390 can be best used to support the progress of looked after children in the school and meet the needs
391 identified in the child's personal education plan. The designated teacher should also work with the

392 virtual school head to promote the educational achievement of previously looked after children. In other
 393 schools and colleges, an appropriately trained teacher should take the lead. More information can be
 394 found in [Designated teacher for looked after and previously looked after children](#) and [Promoting the](#)
 395 [education of looked after and previously looked after children](#).

396 6. Procedure

397 Roles and responsibilities

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

401 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-
 402 contractors, partner organisations and visitors are aware of the policy and are supported to implement
 403 and work in accordance with it, as well as creating a management culture that encourages a focus on
 404 safeguarding. They must ensure that they are responsive, acting immediately if they become aware of
 405 any safeguarding concerns, and supportive towards employees or volunteers who complain about
 406 breaches in this policy.

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

410
411


Name: Sarah Stacey
Contact: 01908 542912 sarah.stacey@cambiangroup.com

412

413 6.4. **Our DSL** is Sarah Stacey - Principal who is a senior member of our leadership team. The role of the DSL
 414 is to:

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

- 426 safeguarding and welfare (including online and digital safety) and when deciding whether to make
427 a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- 428 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,
429 where safeguarding concerns are linked to mental health.
- 430 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child
431 or adult) and, where appropriate, the Local Authority Designated Officer (LADO).
- 432 • Liaise with the headteacher or principal (if they are not the DSL themselves) to inform him or her of
433 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police
434 investigations. This should include being aware of the requirement for children to have an
435 Appropriate Adult. Further information can be found in the statutory guidance - [PACE Code C 2019](#).
- 436 • As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for
437 child protection concerns in cases which concern a staff member.
- 438 • Refer cases to the Channel programme where there is a radicalisation concern as required.
- 439 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the
440 Disclosure and Barring Service as required; and
- 441 • Refer cases where a crime may have been committed to the police as required. [NPCC - When to](#)
442 [call the police](#) should help understand when to consider calling the police and what to expect when
443 working with the police.
- 444 • Act as a source of advice, support and expertise within the location when deciding to make a
445 referral by liaising with relevant agencies.
- 446 • Help promote educational outcomes by sharing the information about the welfare, safeguarding
447 and child protection issues that children are experiencing, or have experienced, with teachers and
448 school and college leadership staff.
- 449 • Identify staff safeguarding training needs and organise training for their staff.
- 450 • Participate in local safeguarding boards when required.
- 451 • Evaluate and contribute to high standards of safeguarding practice at the location.
- 452 • Work to ensure that the wellbeing of children and young people is in constant focus and that they
453 are guarded from harm or abuse.
- 454 • Ensure the child protection and safeguarding policy is available publicly and parents/those with
455 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may
456 be made and the role of the school/college/home in this.
- 457 • Understands the relevant data protection legislation and regulations, especially The Data Protection
458 Act 2018.
- 459 6.5. More details about the role of the DSL including their availability, management of referrals, information
460 sharing, working with others, raising awareness and other can be found in [KCSIE 2023 Annex C - Role](#)
461 [of the DSL](#)
- 462 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where
463 asked do to so. There are arrangements for covering the role of the DSL when Sarah Stacey is

464 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding
465 Team lead by a DSL with a number of deputies where required. Our Designated Deputies are:
466

NAME	CONTACT NUMBER	EMAIL ADDRESS
Josh Mayer	01908 542912	joshua.mayer@cambianguroup.com
Claire Murr	01908 542912	claire.murr@cambianguroup.com
Kerri Webster	01908 542912	kerri.webster@cambianguroup.com
Danielle Roberts	01908 542912	danielle.roberts@cambianguroup.com
Charlotte Utaipiboon	01908 542912	charlotte.utaipiboon@cambianguroup.com

467

468 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected
469 abuse and neglect should be given the highest priority.

470 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and**
471 **Safeguarding at Cambian.**

472 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps
473 to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff
474 must use the correct forms when recording and managing concerns and allegations regarding the
475 abuse of individuals. Education services must use Behaviour Watch system: Concern/Safeguarding
476 function to record concerns. Where, throughout this policy, references are made to the 'concern form'
477 this means either **25.04 Concern form** which is a word document (part of this policy) or the Behaviour
478 Watch – Concern/Safeguarding functionality where the system is being used.

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

480 6.10. **The DSL** is responsible for ensuring that child protection files are kept up to date. Information should
481 be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate
482 child protection file for each child. Schools and colleges should use the Behaviour Watch system -
483 Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs
484 per child/young person as necessary.

485 6.11. Records should include:

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

489 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content
490 within it is shared, this happens in line with information sharing advice as set out in [KCSIE 2023](#) and
491 [Information sharing advice for safeguarding practitioners](#). Schools and colleges using Behaviour Watch
492 must set up their system group purposes in line with Behaviour Watch guidance. Behaviour Watch
493 'Safeguarding Group' controls who can view and report on Concern/SG slips and 'Not Safeguarding
494 Group' to restrict who can complete certain sections within the Concern/SG slips.

495 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**
496 **each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school or

497 college additional options to contact a responsible adult when a child missing education is also
498 identified as a welfare and/or safeguarding concern.

499 **LADO referral criteria (KCSIE2023) – meeting the harm threshold**

500 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if
501 they continue to work in regular or close contact with children in their present position, or in any capacity
502 with children in a school or college. This guidance should be followed where it is alleged that anyone
503 working in the school or college that provides education for children under 18 years of age, including
504 supply teachers, volunteers and contractors has:

- 505 • behaved in a way that has harmed a child, or may have harmed a child, and/or,
- 506 • possibly committed a criminal offence against or related to a child, and/or,
- 507 • behaved towards a child or children in a way that indicates he or she may pose a risk
508 of harm to children; and/or,
- 509 • behaved or may have behaved in a way that indicates they may not be suitable to work
510 with children

511 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of](#)
512 [the Children Act 1989 as amended by the Adoption and Children Act 2002](#).

513 6.16. The last bullet point above includes behaviour that may have happened outside of school or college
514 that might make an individual unsuitable to work with children; this is known as transferable risk.
515 Where appropriate an assessment of transferable risk to children with whom the person works should
516 be undertaken. If in doubt, seek advice from the local authority designated officer (LADO).

517 6.17. This above information relates to members of staff, supply staff and volunteers who are currently
518 working in any school or college regardless of whether the school or college is where the alleged abuse
519 took place. Allegations against a teacher who is no longer teaching should be referred to the police.
520 Historical allegations of abuse should also be referred to the police.

521 **Children potentially at greater risk of harm**

522 6.18. Many children and young people in our services (education and care) have an allocated social worker
523 due to safeguarding or welfare needs.

524 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's
525 experiences of adversity and trauma can leave them vulnerable to further harm, as well as
526 educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

527 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use
528 this information so that decisions can be made in the best interests of the child's safety, welfare and
529 educational outcomes. This should be considered as a matter of routine. There are clear powers to
530 share this information under existing duties on both local authorities and schools and colleges to
531 safeguard and promote the welfare of children.

532 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,
533 responding to unauthorised absence or missing education where there are known safeguarding risks)
534 and about promoting welfare (for example, considering the provision of pastoral and/or academic
535 support, alongside action by statutory services). Schools/colleges must follow missing from education
536 protocol agreed with their LA.

537 6.22. Children missing from education, particularly persistently, can act as a vital warning sign to a range of
538 safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county
539 lines. It is important the school or college's response to children missing from education supports

540 identifying such abuse and helps prevent the risk of them going missing in the future. More information
541 can be found in [para 175 of KCSIE 2023](#)

542 **Unexplained body marks**

543 6.23. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,
544 swellings, cuts and scratches which by and large will be as a result of daily activities or for some
545 individuals as a result of self-injurious behaviour. However, all marks or physical changes must be
546 recorded appropriately using a weekly body chart. A concern form must be completed for all
547 unexplained marks and physical changes and passed to the DSL (or a deputy) along with copies of the
548 last 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always
549 be kept informed. Concern log should be updated with concern and relevant reference number
550 provided to concern.

551 6.24. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
552 correct course of action for dealing with unexplained body marks.

553 6.25. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if
554 no reasonable explanation can be given the DSL must contact the local Safeguarding Authority for
555 further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding
556 Concern.

557 6.26. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
558 opened and safeguarding process followed.

559 6.27. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
560 must be shared with social worker and parents.

561 **Disclosure from an Individual**

562 6.28. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
563 **procedure.**

564 6.29. It is important to note that children/young people may not find it easy to tell staff about their abuse
565 verbally. Children/young people can show signs or act in ways that they hope adults will notice and
566 react to. In some cases, the victim may not make a direct report. For example, a friend may make a
567 report or a member of school or college staff may overhear a conversation that suggests a child has
568 been harmed or a child's/young person's own behaviour might indicate that something is wrong. If
569 staff have any concerns about a child's/young person's welfare, they should act on them immediately
570 rather than wait to be told and follow the procedure described in **Appendix 3. Child Protection and**
571 **safeguarding procedure.**

572 6.30. In case of reports of sexual violence and sexual harassment between children and young people, these
573 are extremely complex to manage. It is essential that victims are protected, offered appropriate support
574 and every effort is made to ensure their education and care is not disrupted. It is also important that
575 other children, young people and staff are supported and protected as appropriate.

576 6.31. The service's initial response to a report from a child is incredibly important. How the staff respond to
577 a report can encourage or undermine the confidence of future victims of sexual violence and sexual
578 harassment to report or come forward.

579 6.32. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.
580 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage
581 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding
582 Authority) to discuss next steps. Staff should only share the report with those people who are necessary
583 in order to progress it. It is important that the victim understands what the next steps will be and whom
584 the report will be passed to.

585 6.33. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and
586 how the report will be progressed, don't ask leading questions and only prompt the child where
587 necessary with open questions – where, when, what, etc. It is important to note that whilst leading

- 588 questions should be avoided, staff can ask children if they have been harmed and what the nature of
589 that harm was.
- 590 6.34. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or
591 college staff. It is important that the person to whom the child discloses recognises that the child has
592 placed them in a position of trust. They should be supportive and respectful of the child.
- 593 6.35. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the
594 report and immediately write up a thorough summary. This allows the staff member to devote their full
595 attention to the child and to listen to what they are saying. It may be appropriate to make notes during
596 the report (especially if a second member of staff is present). However, if making notes, staff should be
597 conscious of the need to remain engaged with the child and not appear distracted by the note taking.
598 Either way, it is essential a written record is made using Concern form which is part of this policy. The
599 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report
600 to the DSL must be completed within an hour from the moment of the disclosure being made.
- 601 6.36. Only recording the facts as the child presents them. The notes should not reflect the personal opinion
602 of the note taker. Staff should be aware that notes of such reports could become part of a statutory
603 assessment by Safeguarding Authority and/or part of a criminal investigation.
- 604 6.37. In cases where either a child/young person informs the staff that an act of FGM – however described
605 – has been carried out on her, or where the staff observes physical signs on a girl appearing to show
606 that an act of FGM has been carried out these situations, the police must be informed. The DSL should
607 also be informed who will trigger child protection/safeguarding procedures described in this policy. If
608 a child/young person is at immediate risk – the Police (999) must be contacted immediately. If a
609 child/young person required medical attention, follow steps identified in ‘**Setting priorities**’ section
610 below.
- 611 6.38. Remember, **do not**:
- 612 • Investigate the incident
 - 613 • Ask leading questions
 - 614 • Get the young person to repeat the disclosure over and over
 - 615 • Make assumptions or offer alternative explanations
 - 616 • Approach/inform the alleged abuser
- 617 6.39. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**
618 **and recording procedure.**
- 619 6.40. All staff know that they can contact the Local Authority direct should that be necessary. Where a
620 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local
621 Safeguarding Adult Board. Where someone is over 18 but still receiving children’s services, the matter
622 should be dealt with by the local Safeguarding Adult Board.
- 623 6.41. For allegation made against a staff member or senior managers/directors follow relevant allegations
624 procedures described later on in this policy.
- 625 6.42. Where contact is made with the Local Authority in which Cambian Potterspurty Lodge School and
626 Children’s Home is geographically located, contact will also be made with the individual’s own Local

627 Authority and also the child/young person's social worker. This will be completed by one of the
628 members of the school/college/home's safeguarding team.

629 6.43. In the case of serious harm, and/or the individual is in immediate danger the local police should be
630 informed immediately and they can take immediate protective action as necessary.

631 6.44. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
632 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding
633 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128**.

6 Risk Assessment

635 6.45. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk
636 and needs assessment. Where there has been a report of sexual harassment, the need for a risk
637 assessment should be considered on a case-by-case basis. The risk and needs assessment should
638 consider:

- 639 • the victim, especially their protection and support,
- 640 • whether there may have been other victims,
- 641 • the alleged perpetrator(s); and
- 642 • all the other children, (and, if appropriate, adult students and staff) at the school or
643 college especially, and any actions that are appropriate to protect them from the alleged
644 perpetrator(s), or from future harms.
- 645 • The time and location of the incident, and any action required to make the location safer.

646 6.46. Risk assessments should be recorded (written or electronic) and should be kept under review. At all
647 times, staff should be actively considering the risks posed to all their pupils and students and put
648 adequate measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure
649 they are engaging with Safeguarding Authority and specialist services as required. Where there has
650 been a report of sexual violence, it is likely that professional risk assessments by social workers and or
651 sexual violence specialists will be required. The above school or college risk assessment is not intended
652 to replace the detailed assessments of expert professionals. Any such professional assessments
653 should be used to inform the school's or college's approach to supporting and protecting their pupils
654 and students and updating their own risk assessment.

6 Following a report - what to consider

656 6.47. Important considerations will include:

- 657 • the wishes of the victim in terms of how they want to proceed. This is especially important in
658 the context of sexual violence and sexual harassment. Victims should be given as much
659 control as is reasonably possible over decisions regarding how any investigation will be

- 660 progressed and any support that they will be offered. This will however need to be balanced
661 with the school's or college's duty and responsibilities to protect other children;
- 662 • the nature of the alleged incident(s), including whether a crime may have been
663 committed and/or whether harmful sexual behaviour HSB has been displayed;
 - 664 • the ages of the children involved;
 - 665 • the developmental stages of the children involved;
 - 666 • any power imbalance between the children. For example, is the alleged perpetrator(s)
667 significantly older, more mature or more confident? Does the victim have a disability or
668 learning difficulty?
 - 669 • if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be
670 accompanied by other forms of abuse and a sustained pattern may not just be of a
671 sexual nature);
 - 672 • that sexual violence and sexual harassment can take place within intimate personal
673 relationships between children/young people/adults;
 - 674 • importance of understanding intra familial harms and any necessary support for siblings
675 following incidents
 - 676 • are there ongoing risks to the victim, other children, adult students or school or college
677 staff; and
 - 678 • other related issues and wider context, including any links to child sexual exploitation
679 and child criminal exploitation.
- 680 6.48. As always when concerned about the welfare of a child, all staff should act in the best interests of the
681 child. In all cases, schools and colleges should follow general safeguarding principles as set out
682 throughout this guidance. Immediate consideration should be given as to how best to support and
683 protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

6.4 Options to manage the report

- 685 6.49. It is important that schools and colleges consider every report on a case-by-case basis. When to inform
686 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going
687 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college
688 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be
689 informed of the allegations. However, as per general safeguarding principles, this does not and should
690 not stop the school or college taking immediate action to safeguard their children, where required.
- 691 6.50. There are four likely scenarios for schools and colleges to consider when managing any reports of
692 sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and
693 actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is
694 particularly important to look out for potential patterns of concerning, problematic or inappropriate
695 behaviour. Where a pattern is identified, the school or college should decide on a course of action.
696 Consideration should be given as to whether there are wider cultural issues within the school or college
697 that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or
698 staff training could be delivered to minimise the risk of it happening again. The four scenarios are:
- 699 • **Manage internally;** In some cases of sexual harassment, for example, one-off incidents,
700 the school or college may take the view that the children concerned are not in need of
701 early help or that referrals need to be made to statutory services and that it would be
702 appropriate to handle the incident internally, perhaps through utilising their behaviour
703 policy and by providing pastoral support.
 - 704 • **Early help:** In line with the above, the school or college may decide that the children
705 involved do not require referral to statutory services but may benefit from early help. Early

706 help means providing support as soon as a problem emerges, at any point in a child's
707 life. Providing early help is more effective in promoting the welfare of children than
708 reacting later. Early help can be particularly useful to address non-violent harmful sexual
709 behaviour and may prevent escalation of sexual violence. It is particularly important that
710 the DSL (and their deputies) know what the Early Help process is and how and where to
711 access support.

712 • Schools and colleges, as relevant agencies, should be part of discussions with statutory
713 safeguarding partners to agree the levels for the different types of assessment and
714 services to be commissioned and delivered, as part of the local arrangements.
715 Safeguarding partners should publish a local threshold document which includes the
716 process for the local early help assessment and the type and level of early help services
717 to be provided, and DSLs (and their deputies) will need to familiarise themselves with this
718 document.

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

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

728 **Unsubstantiated, unfounded, false or malicious reports**

729 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider
730 whether the child and/or the person who has made the allegation needs help or may have been
731 abused by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding
732 authority may be appropriate.

733 6.52. If a report is shown to be deliberately invented or malicious, the school or college should consider
734 whether any disciplinary action is appropriate against the individual who made it as per their own
735 behaviour policy.

736 **Safeguarding and supporting the victim**

737 6.53. The needs and wishes of the victim should be paramount (along with protecting the child)/young
738 person in any response. It is important they feel in as much control of the process as is reasonably
739 possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine.
740 Overall, the priority should be to make the victim's daily experience as normal as possible, so that the
741 school or college is a safe space for them.

742 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the
743 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual
744 violence and sexual harassment, a power imbalance is likely to have been created between the victim
745 and alleged perpetrator(s).

746 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel
747 ashamed for making a report. This has been made clear throughout this policy and procedure.

748 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
749 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
750 from that for a report of rape.

751 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,
752 mental, and sexual health problems and unwanted pregnancy. Children and young people that have
753 a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual
754 Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and

755 survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice
756 to all children and adults, regardless of when the incident occurred.

757 6.58. Children and Young People’s Independent Sexual Violence Advisors (ChISVAs) provide emotional and
758 practical support for victims of sexual violence. They are based within the specialist sexual violence
759 sector and will help the victim understand what their options are and how the criminal justice process
760 works if they have reported or are considering reporting to the police. ChISVAs will work in partnership
761 with schools and colleges to ensure the best possible outcomes for the victim.

762 Safeguarding and supporting the alleged perpetrator(s)

763 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental
764 advice: [Sexual violence and sexual harassment between children at schools and colleges](#). The
765 following principles are based on effective safeguarding practice and should help shape any decisions
766 regarding safeguarding and supporting the alleged perpetrator(s):

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

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

777 • Consider the proportionality of the response. Support (and sanctions) should be
778 considered on a case-by-case basis. The alleged perpetrator(s) may potentially have
779 unmet needs (in some cases these may be considerable) as well as potentially posing a
780 risk of harm to other children. HSB in young children may be (and often are) a symptom
781 of either their own abuse or exposure to abusive practices and or materials.

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

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

789 Setting priorities

790 6.60. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
791 safety of the individual.

792 6.61. Where appropriate, any concerns will be discussed with the individual’s family / carers and where
793 possible their agreement will be sought to making a referral to the Local Authority. However, where
794 there is a conflict of interests between the Individual and parent/guardian, the interests of the individual
795 must take priority and Cambian Potterspurty Lodge School and Children’s Home the right to contact the
796 individual’s local authority, social care or the police, without notifying parents/carers if this is in their
797 best interests.

798 6.62. If an urgent medical, attention or advice is required and GP/specialist doctor is not available, staff MUST
799 use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.

800 6.63. If the situation is life-threatening, staff must call 999 immediately and ask for an ambulance.
801 Alternatively, if it is assessed to be in the best interest of the child/young person - the DSL MUST take
802 the Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local

803 Authority/Police, remembering that every reasonable effort should be made to inform the
804 parents/carers as soon as possible.

805 6.64. If the suspected abuse is sexual, then the medical professional must determine if the medical
806 examination should be delayed until the Local Authority and the Police can liaise with the hospital.
807 There is a possibility that the needs of the young person are such that medical attention is the priority,
808 in such case medical professional's judgment must be followed. There must at all times be an
809 appropriate adult (parent, guardian or a social worker) with the individual whether from the individual's
810 care home/school/college, the Local Authority or the Police, if the parents/carers are not included. This
811 section must be read in conjunction with our **0.29. Child Sexual Exploitation policy**.

812 6.65. Cambian will provide an advocate to each individual where appropriate, if they are unable to speak
813 for themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to the
814 Mental Capacity Act. Further information on MCA are available in our **0.13. Mental Capacity and
815 Consent policy**.

816 Allegation of abuse by one or more Individuals on another Individual

817 6.66. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures
818 for dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an
819 Individual is suffering or likely to suffer significant harm'. DSL must refer individual-on-individual abuse
820 including child on child/young adult on young adult or between individuals of a different age or other
821 to a Safeguarding Authority, local authority and regulator.

822 Allegation of abuse of an Individual who is not registered at our provision – staff involved

823 6.67. If we were given information that suggested that someone who does not reside at or attends our
824 location has been abused by one of our members of staff, the DSL would immediately report this to
825 the Local Authority and LADO. The Head of Service must be kept informed and HR Business Partner
826 consulted. Should the staff member be involved we would then formally advise the member of staff of
827 the allegation, making it clear that we would not play any part in the investigatory process. The
828 employee would be advised of the possibility of facing suspension, re-assignment to other duties (to
829 manage any perceived risks) etc., in exactly the same way as if the allegation had involved an Individual
830 at our home/school/college. However, the HR Business Partner must be consulted before any action
831 is taken. If the allegation were subsequently proved to be unfounded, he or she would be given full
832 support in resuming their career. Should we be asked by LADO/Safeguarding authority to be involved
833 in any potential investigations or parts of it, an HR Business Partner will have to be consulted first. At
834 this point, an assessment will need to be made to identify what detail (if any) can be disclosed to a
835 member of staff involved.

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

837 6.68. If we were given information that suggested that someone who does not reside at or attends our
838 location has been abused by a third party (known or unknown to the provision), the DSL would
839 immediately report this to the Local Authority and Police. The Head of Service must be kept informed.

840 DSL will follow advice provided by the leading agency and report back to the Head of Service who will
841 explore any associated risk/s in relation to the provision.

842 Allegations against staff

843 6.69. All allegations must be reported to the DSL Sarah Stacey or in their absence to a DSL Deputy – see your
844 local Safeguarding poster. In addition, where appropriate - HR Business Partner must be consulted.

845 6.70. When an allegation is made against a member of staff, set procedures must be followed, see the
846 flow chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

847 6.71. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully
848 assessed and investigated. Staff who are the subject of an allegation have the right to have their case
849 dealt with fairly, quickly and consistently and to be kept informed of its progress.

850 6.72. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided
851 for what to do in the event an allegation is made against them.

852 Allegations against staff in Education

853 6.73. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and
854 contractors. The allegations are split into two groups:

855 • Allegations that may meet the harm threshold (see **LADO referral criteria**) – **meeting the**
856 **harm threshold** of this policy)

857 • Allegation/concerns that do not meet the harms threshold – referred in the guidance and
858 this policy as 'low - level concerns' - **Appendix 11. Low – level concerns (Education)**.

859 6.74. This is about managing cases of allegations that might indicate a person would pose a risk of harm if
860 they continue to work in regular or close contact with children in their present position, or in any capacity
861 with children in a school or college.

862 6.75. The information above relate to members of staff, supply staff, volunteers and contractors who are
863 currently working in any school or college regardless of whether the school or college is where the
864 alleged abuse took place. It is advised that in Education allegations against people listed above should
865 be referred to the Head/Principal who is often the DSL, however where the Head/Principal is not the
866 DSL, allegations against staff including supply, volunteers and contractors must be referred to the
867 Head/Principal who may liaise with the DSL. This is because the concern/allegation may align with
868 other performance or personal related issues the Head/Principal might already be aware of, whereas
869 the DSL may not be. The Principal/Head should ensure the DSL is briefed as appropriate and will then
870 decide whom the case should be led by – the DSL or themselves. Allegations against a teacher who is
871 no longer teaching should be referred **to the police** and HR Business Partner advised.

872 6.76. Where an adult makes an allegation to a school or college that they were abused as a child, the
873 individual should be advised to report the allegation to the police. Non-recent allegations made by a
874 child, should be reported to the LADO in line with the local authority's procedures for dealing with non-
875 recent allegations. The LADO will coordinate with children social care and the police. Abuse can be
876 reported no matter how long ago it happened.

877 6.77. Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher
878 because of serious misconduct, or might have dismissed them or ceased to use their services had they
879 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching
880 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be
881 found on GOV.UK.

882 6.78. Schools and colleges using Behaviour Watch must ensure that concerns/allegations related to staff
883 ['staff' slip], are set up to be only visible to the selected group of people e.g. Head teacher/Principal or
884 the DSL or both depending on the schools/colleges internal arrangement. The same approach must
885 be applied to Real Time Notifications. As the schools'/colleges' arrangements around who will receive

886 staff related concerns will vary between the schools/colleges, it is up to schools to ensure their
887 arrangements are considered when setting up the Concern/SG: *Staff*function.
888

889 Allegations against supply teachers and all workers supplied by agency

890 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual
891 not directly employed by them, where its disciplinary procedures do not fully apply because agencies
892 will have their own policies and procedures; for example, supply teachers or contracted staff provided
893 by an employment agency or business.

894 6.80. Whilst the organisation's schools and colleges are not the employer of supply teachers, they should
895 ensure allegations are dealt with properly. In no circumstances should a school or college decide to
896 cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising
897 with the LADO to determine a suitable outcome. Schools and colleges must also consult the HR
898 Business Partner who may advise further. Governance boards and proprietors should discuss with the
899 supply agency or agencies where the supply teacher is working across a number of schools of
900 colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of
901 the school or college, whilst they carry out their investigation.

902 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
903 children's social care. The school or college will usually take the lead because agencies do not have
904 direct access to children or other school or college staff, so they will not be able to collect the facts when
905 an allegation is made, nor do they have all the relevant information required by the LADO as part of
906 the referral process.

907 6.82. When using a supply agency, schools and colleges should inform the agency of its process for
908 managing allegations but also take account of the agency's policies and investigatory process and
909 their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human
910 resource manager or equivalent to meetings and keeping them up to date with information about its
911 policies. It is important we not blur the lines of employment, so in case there is any confusion, HR
912 Business Partner should be consulted.
913

914 Allegations against the DSL (Principal or Registered Manager or DSL as a substantive role)

915 6.83. All allegations must be reported to:

916 - Education division: Regional Education Lead Jarlath O'Brien, unless within residential
917 education the Registered Manager is the DSL in which case the matter will be referred
918 to the Head/ Principal. For the DSL fulfilling the role as their substantive role, all
919 allegations must be reported to the Principal/Head.

920 - Children's residential care division: Regional Manager James Watson, unless Regional
921 Manager is the DSL in which case the matter will be referred to the Managing Director.

922 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above)
923 will then refer the matter to LADO and notify their line manager:

924 - Education division: Regional Education Lead Jarlath O'Brien or

925 - Managing Director for Education Christopher Strong. In Independent schools – the
926 Proprietor must also be notified.

927 - Children's residential care division: Managing Director Graham Norris.

928 **6.85.** The person who referred the matter to LADO in line with agreed course of action will decide about who
929 will lead the case including management investigation – should the allegation threshold be met. The

930 appropriate HR Business Partner should be notified, so they can advise and where required - support
931 the investigation.

932 6.86. In residential education associated with children's homes/care homes the Responsible/Nominated
933 Individual MUST also be notified.

934 6.87. Services using Behaviour Watch system – allegations made against the DSL or DSL Deputy who have
935 full access to the system including Concern/Safeguarding function, should not be initially entered to
936 the system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as
937 they would have been prior to implementation of the Behaviour Watch. This is to ensure that no one,
938 including those who are part of the service's Safeguarding Team are able to see the details of their
939 own case which could have a detrimental impact on the investigation itself and the outcome of it.
940 However, once the case has been concluded, a decision should then be made about whether or not
941 the detail related to the case should be retrospectively entered in to Behaviour Watch or kept in the
942 original format. Such a decision should be made by the Case Manager, Managing Director and a
943 member of HR Team. Should a decision be made to keep it in the original format, a Concern/SG slip in
944 the Behaviour Watch must still be retrospectively opened and a note added to reflect that there was
945 an allegation made against the DSL/DSL Deputy but without specifying any further detail about the
946 character of the allegation. Instead, a reference number of the case and location of the pack related
947 to the case is provided. This action will ensure that the case has been captured in the system, which
948 will then allow the service to generate a log with accurate numbers of concerns and safeguarding
949 cases for the service.

95 Allegations against the Regional Manager/other Regional staff

951 6.88. 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 LADO. Following this, the allegation should be
953 passed to the identified senior person to follow through with LADO and subsequently act in line with
954 agreed course of action. This means that the DSL will retain the responsibility to report the initial
955 concern, but will have no further part in the process regarding gathering any information or, should it
956 be required, in the actual investigation in relation to a senior member.

957 6.89. Allegations not linked to specific site must be reported to Managing Director who will refer the matter
958 to local Safeguarding Authority/LADO and act in line with agreed course of action.

959 6.90. The appropriate HR Business Partner should be notified, so they can advise and where required -
960 support the investigation.

96 Allegations against the Operations Directors or Managing Director

962 6.91. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
963 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be
964 passed to the identified senior person to follow through with LADO and subsequently act in line with
965 agreed course of action. This means that the DSL will retain the responsibility to report the initial
966 concern, but will have no further part in the process regarding gathering any information or, should it
967 be required, in the actual investigation in relation to a senior member.

968 6.92. Allegations not linked to specific site must be reported to Managing Director for Education who will
969 refer the matter to LADO and act in line with agreed course of action.

970 6.93. The Head of HR should be notified, so they can advise and where required - support the investigation.

97 Allegations against any other Senior Leader

972 6.94. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
973 Head/Principal) who will make the initial referral to LADO Following this, the allegation should be
974 passed to the identified senior person to follow through with LADO and subsequently act in line with
975 agreed course of action. This means that the DSL will retain the responsibility to report the initial

976 concern, but will have no further part in the process regarding gathering any information or, should it
977 be required, in the actual investigation in relation to a senior member.

978 6.95. Allegations not linked to specific site must be reported to the person's (whom allegation is made
979 against) line manager who will refer the matter to LADO and act in line with agreed course of action.

980 6.96. The Head of HR should be notified, so they can advise and where required - support the investigation.

981 Allegations against the Executive Head of Children's Services

982 6.97. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
983 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be
984 passed to the identified senior person to follow through with LADO and subsequently act in line with
985 agreed course of action. This means that the DSL will retain the responsibility to report the initial
986 concern, but will have no further part in the process regarding gathering any information or, should it
987 be required, in the actual investigation in relation to a senior member.

988 6.98. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
989 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

990 6.99. The Head of HR should be notified, so they can advise and where required - support the investigation.

991 Allegations against the Chief Executive Officer

992 6.100. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
993 Head/Principal) who will make the initial referral to LADO Following this, the allegation should be
994 passed to the identified senior person to follow through with LADO and subsequently act in line with
995 agreed course of action. This means that the DSL will retain the responsibility to report the initial
996 concern, but will have no further part in the process regarding gathering any information or, should it
997 be required, in the actual investigation in relation to a senior member.

998 6.101. Allegations not linked to specific site must be reported to Executive Director Compliance – Amanda
999 Sherlock who will refer the matter to LADO and act in line with agreed course of action.

1000 6.102. The Head of HR should be notified, so they can advise and where required - support the investigation.

1001 Allegations - The initial response

1002 6.103. Where the school or college identifies a child/young person has been harmed, that there may be an
1003 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact
1004 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
1005 two aspects to consider when an allegation is made:

1006 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child
1007 is not at risk and referring cases of suspected abuse to the local authority children's social
1008 care as described in Part one of this guidance.

1009 • **Investigating and supporting the person subject to the allegation** - the case manager
1010 should discuss with the LADO, the nature, content and context of the allegation, and
1011 agree a course of action.

1012 6.104. When dealing with allegations, schools and colleges should:

- 1013 • apply common sense and judgement
- 1014 • deal with allegations quickly, fairly and consistently; and
- 1015 • provide effective protection for the child and support the person subject to the allegation.

1016 6.105. Schools and colleges should ensure they understand the local authority arrangements for managing
1017 allegations, including the contact details and what information the LADO will require when an
1018 allegation is made. Before contacting the LADO, schools and colleges should conduct basic enquiries
1019 in line with local procedures to establish the facts to help them determine whether there is any

1020 foundation to the allegation, being careful not to jeopardise any future police investigation. For
1021 example:

- 1022 • was the individual in the school or college at the time of the allegations?
- 1023 • did the individual, or could they have, come into contact with the child?
- 1024 • are there any witnesses? and,
- 1025 • was there any CCTV footage?

1026 6.106. These are just a sample of example questions. Services should be familiar with what initial information
1027 the LADO will require. This information can be found in local policy and procedural guidance provided
1028 by the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be
1029 shared with the HR department to support any investigation.

1030 6.107. When to inform the individual of the allegation should be considered carefully on a case-by-case basis,
1031 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1032 6.108. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
1033 involving the police and/or children's social care will be convened in accordance with the statutory
1034 guidance [Working Together to Safeguard Children](#).

1035 6.109. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
1036 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next
1037 steps with the case manager (A 'case manager' will be the person leading any investigation. In most
1038 cases this will be a senior leader from outside the school/home). The LADO should be informed who
1039 will lead the investigation to ensure there is no conflict of interest or any other concerns related to the
1040 choice of the case manager.

1041 **Further Action**

1042 6.110. Where the initial discussion initial discussion leads to no further action, the case manager and the
1043 LADO should:

- 1044 • record the decision and justification for it; and,
- 1045 • agree on what information should be put in writing to the individual concerned and by
1046 whom.

1047 **Further enquiries**

1048 6.111. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
1049 manager should discuss how and by whom the investigation will be undertaken. In straightforward
1050 cases, the investigation should normally be undertaken by a senior member of the school's or college's
1051 staff.

1052 6.112. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
1053 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
1054 Lead (Education or Care), a Director, HR Business Partner or an independent investigator if appropriate.

1055 6.113. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly
1056 as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly
1057 intervals, depending on the complexity of the case.

1058 6.114. Wherever possible, the first review should take place no later than four weeks after the initial
1059 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
1060 meeting if the investigation continues. The LADO will provide advice and guidance to schools and
1061 colleges when considering allegations against adults working with children. The LADO's role is not to

1062 investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that
1063 is by the police, children's social care, the school or college, or a combination of these.

1064 **Suspension**

1065 6.115. Suspension should not be an automatic response when an allegation is reported. All options to avoid
1066 suspension should be considered prior to taking that step. The case manager must consider carefully
1067 whether the circumstances warrant suspension from contact with children at the school or college, or
1068 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a
1069 child or other children at the school or college is/are at risk of harm, or the allegation could be
1070 considered as gross or serious misconduct. Prior to any suspension, the case manager must consult
1071 with their HR Business Partner and the LADO, as well as the police and Safeguarding Authority where
1072 they have been involved. More information on suspension and associated process can be found in
1073 [KCSIE 2023 Part 4 - Suspension](#).

1074 **Supporting those involved**

1075 6.116. The welfare of a child/young person is paramount) and this will be the prime concern in terms of
1076 investigating an allegation against a person in a position of trust. However, when an allegation or
1077 safeguarding concern is being investigated it is likely to be a very stressful experience for the adult
1078 subject of the investigation, and potentially for the family members. It is important that an employer
1079 offers appropriate welfare support at such a time and recognises the sensitivity of the situation.
1080 Information is confidential and should not ordinarily be shared with the other staff or with children or
1081 parents who are not directly involved in the investigation. More about employer's duty of care to their
1082 employees can be found in the KCSIE2023 guidance.

1083 6.117. Staff whom allegation/s have been made against must always be supported and if suspended they
1084 will receive a support person (nominated contact), any suspension is not an indication of guilt.

1085 **Allegation outcomes**

1086 6.118. The definitions that should be used when schools and colleges determine the outcome of an allegation
1087 are set out below:

- 1088 • Substantiated: there is sufficient evidence to prove the allegation;
- 1089 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
1090 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1091 • False: there is sufficient evidence to disprove the allegation;
- 1092 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
1093 The term, therefore, does not imply guilt or innocence; or
- 1094 • Unfounded: to reflect cases where there is no evidence or proper basis which supports
1095 the allegation being made.

1096 6.119. It should be noted that these definitions are available to support the decision-making process.
1097 However, in certain cases, in the absence of any substantiating evidence, the Company may still

1098 progress through the formal disciplinary procedure if there are reasonable grounds to do so, or there
1099 is a reasonable belief that an employee has committed an act of misconduct.

1100 6.120. Ultimately, the options open to the school or college depend on the nature and circumstances of the
1101 allegations and the evidence and information available. This will range from taking no further action,
1102 to dismissal or a decision not to use the person's services in future.

1103 Serious incident reporting

1104 6.121. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
1105 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

1106 Death of someone in our care including rapid response to unexpected death

1107 6.122. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
1108 rapid response, process described below:

- 1109
- Call the Ambulance and Police
- 1110
- Unless the 999 operator tells you to, do not touch the person; do not move anything
1111 around them, which may form part of forensic evidence. Police will decide about the
1112 forensic examinations and appropriate security of the scene.
- 1113
- DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI)
1114 reporting procedure. The DSL will contact the Managing Director of the division they work
1115 in and verbally inform them of what happened before completing SUI Part 2.
- 1116
- DSL will contact Children's/Adults Social Care Team
- 1117
- Where there is a suicide/suspected suicide then Child & Adolescent Mental Health
1118 Services (CAMHS) should also be notified by the Safeguarding Authority.

1119 6.123. Once the above rapid steps have been taken, further steps described below must be followed.

1120 6.124. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
1121 following within 24 hours:

- Group Executive Director Managing Director, Responsible/Nominated Individual,
1122 Regional Lead following the **35.01. Caretech Children's services SUI process.**
 - Next of kin/parents/carer of the deceased.
1123
 - Where the death of an individual occurs in an education location the assistance of the
1124 local police and social services department should be sought in informing the
1125 parents/guardians.
1126
 - The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
1127
 - Ministry of Justice if applicable.
1128
 - The placing authority/authorities.
1129
 - The local authority responsible for Social Services and Education (where the death takes
1130 place in a registered school) within whose area the education location is situated.
1131
 - The District Health Authority within whose area the education location is situated.
1132
 - The Department for Education, (where the death takes place in a registered school).
1133
 - The Health and Safety Executive.
1134
- 1135

1136 Abuse of position of trust

1137 6.125. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1138 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1139 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1140 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1141 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1142 is over the age of consent.

1143 **Visitors**

1144 6.126. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all
1145 times. All unauthorised visitors will be challenged by staff and reported to the home
1146 manager/headteacher/principal before entry is authorised.

1147 **Volunteers**

1148 6.127. Volunteers undergo checks commensurate with their work in the home/school/college and contact
1149 with children, young people and adults i.e. if they are in regulated activity or not.

1150 **Contractors**

1151 6.128. We will check the identity of all contractors working on site and request the full range of DBS and other
1152 required checks where they work in regulated activity or unsupervised in accordance with the latest
1153 government guidance.

1154 **Use of school or college premises for non-school/college activities**

1155 6.129. Where governance boards or proprietor hire or rent out school or college facilities/premises to
1156 organisations or individuals (for example to community groups, sports associations, and service
1157 providers to run community or extra-curricular activities) they should ensure that appropriate
1158 arrangements are in place to keep children safe.

1159 **Extended school and off-site arrangements**

1160 6.130. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1161 procedures apply. If other organisations provide services or activities on our site we will check that they
1162 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1163 whose procedure is to be followed if there are concerns. There will be clear communication channels
1164 to ensure the DSL is kept appropriately informed.

1165 6.131. When our Individuals are doing off-site activities, including day and residential visits and work-related
1166 activities, we will risk assess and check that effective safeguarding arrangements are in place. The
1167 DSL will be kept appropriately informed.

1168 **Use of mobile phones**

1169 6.132. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1170 access including **Pro 01. Mobile Telephony Policy** at all times.

1171 6.133. All computer equipment and internet access within the home/school/college is subject to 'parental
1172 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1173 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons
1174 during working hours. Staff need to help our Individuals to prepare for the dangers of the internet and
1175 social media whilst promoting the many learning and social opportunities available through the
1176 internet and social media.

1177 6.134. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they **MUST**
1178 neither mention Potterspurty Lodge School and Children's Home or refer to their employment at the

1179 Potterspurty Lodge School and Children's Home. Staff are advised not to communicate with parents,
1180 guardians, carers or Individuals via social networking sites

11 Photography and images

1182 6.135. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1183 6.136. The vast majority of people who take or view photographs or videos of individuals do so for entirely
1184 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people
1185 through taking or using images, so we have some safeguards in place.

1186 6.137. To protect our children, young people or young adults we will:

- 1187 • seek their consent for photographs to be taken or published (for example, on our
1188 website or in newspapers or publications)
- 1189 • seek parental consent of consent from the Individual
- 1190 • not use their full name with an image, only their initials
- 1191 • ensure that personal data is not shared
- 1192 • store images appropriately, securely and for no longer than necessary
- 1193 • only use school equipment, i.e. not personal devices
- 1194 • encourage our children, young people and adults to tell us if they are worried about any
1195 photographs that are taken of them

11 Physical intervention and use of reasonable force

1197 6.138. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1198 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1199 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1200 recorded and monitored.

12 Staff taking medication or other substances

1202 6.139. Staff members must not be under the influence of alcohol or any other substance, which may affect
1203 their ability to care for the individuals. If they are taking medication, they should seek medical advice
1204 and inform the Home Manager/Headteacher/Principal who will review the medical advice and take a
1205 decision as to whether they are fit for work.

1206 6.140. We only allow staff to work if medical advice confirms that their ability to look after individuals is unlikely
1207 to be impaired. Should a member of staff need to bring their medication to the home/school/college,
1208 it must be securely stored and out of reach of all children, young people and young adults. This section
1209 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

12 Information for individuals and relatives/carers

1211 6.141. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be
1212 dealt with independently and that they will be kept involved in the process to the degree that they wish
1213 to be. They will be reassured that they will receive help and support in taking action.

1214 6.142. They will also be advised that they can nominate an advocate or representative to speak and act on
1215 their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how
1216 they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and
1217 may be appointed. They will be advised of rights to legal aid in where appropriate to victim support
1218 and compensation.

12 Recruitment and vetting

1220 6.143. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1221 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

- 1222 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1223 schools should read Part 3 of KCSIE2023 guidance dedicated to Safer Recruitment.
- 1224 6.144. Each education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1225 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1226 proprietor body. This is regularly audited by the school/college SLT and available for inspection.
- 1227 6.145. For agency workers we obtain written confirmation that all checks have been completed, in line with
1228 safer recruitment from the employment business that is supplying the member of agency staff. All
1229 Locations must ensure that an agreement exists between the Location and the agency to confirm that,
1230 in the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1231 before that person can begin work at the home/school/college.
- 1232 6.146. All locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1233 agency.
- 1234 6.147. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to
1235 the same recruitment regulations and procedures as the education staff.

1236 Requirements to inform Disclosure and Barring Services (DBS)

- 1237 6.148. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on
1238 the barred lists is required.
- 1239 6.149. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1240 month after leaving the Location) if a person in regulated activity has been dismissed or removed due
1241 to safeguarding concerns, or would have been had they not resigned.
- 1242 6.150. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1243 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
- 1244 6.151. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1245 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1246 is considered unsuitable to work with children and young people.
- 1247 6.152. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1248 provided at paragraph 179.
- 1249 6.153. All managers must read the group leavers policy – all referrals must be recorded with HR so they can
1250 ensure any future references are correct. The references team log referrals so this can be completed.
1251 This will apply to both: DBS and TRA.

1252 Record keeping

- 1253 6.154. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse
1254 is made, staff must keep clear and accurate records using a Concern Form.
- 1255 6.155. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded
1256 in writing. Information should be kept confidential and stored securely. It is good practice to keep
1257 concerns and referrals in a separate child protection file for each child. Schools/colleges using
1258 Behaviour Watch have Concern/Safeguarding function to record any concerns being raised. A report
1259 per child/young person can also be generated.
- 1260 6.156. Records should be factual, accurate, concise, ethical and relevant.
- 1261 6.157. All recording of written information should be legible and discussions with other professionals and
1262 agencies should be recorded chronologically.
- 1263 6.158. There will be a safeguarding section/folder for each Individual, which will hold any
1264 concerns/safeguarding documentation for that individual. At the front of each folder, there is an Index
1265 for Individual's Concerns. This is to enable the location to keep accurate records of any concerns raised

1266 regarding the individual and aid the monitoring/ reviewing of safeguarding incidents. The folders
1267 should be kept in a secure location.

1268 6.159. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**
1269 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding
1270 information where the concern has escalated. Where this is held as a paper version this is to be made
1271 into a bound booklet and completed by the DSL. If kept electronically, access is to be restricted to the
1272 DSL and deputies only. In either case, this should be kept in a secure location.

1273 **Monitoring**

1274 6.160. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are
1275 recorded, managed and responded to at the Location, at a regional level and at a whole divisional
1276 level, see **section 9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key
1277 Performance Indicators (KPIs) using **CambianKPI** and the identification and management of
1278 safeguarding risks. A report on the position of every site in relation to their KPIs is produced every
1279 Wednesday.

1280 **Training**

1281 6.161. All staff will receive information regarding Child Protection and Safeguarding on induction. The
1282 induction introduces the new staff member to the policy, procedure and practice at the location. They
1283 will also be orientated as to where to find information regarding safeguarding including relevant
1284 posters around the location. As part of their induction all staff are required to read this policy and
1285 confirm that, they understand their role in safeguarding and protecting young people within the service
1286 they are going to work.

1287 6.162. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
1288 be completed as part of staff member induction and annually thereafter. This should include online
1289 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
1290 people/young adult's safeguarding.

1291 6.163. Staff will not be allowed to work with individuals unless they have completed the above training. The
1292 school/college/home must check that supply/agency staff have completed basic awareness training
1293 before being allowed into contact with Individuals.

1294 6.164. Contractors and others on site who might have unsupervised access to individuals must also complete
1295 basic awareness training before being allowed to start work.

1296 6.165. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
1297 practice throughout the year. This can be undertaken in various forums: as a face-to-face or online
1298 session, staff meetings or workshops. In addition to this, safeguarding updates including various
1299 resources are provided to schools and colleges by the external Safeguarding Network.

1300 6.166. The DSL and DSL Deputies should undergo the same level of training providing them with the
1301 knowledge and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided
1302 by the LA within the boundaries they operate and be refreshed at least every two years. Both should
1303 also undertake Prevent awareness training.

1304 **Confidentiality and information sharing**

1305 6.167. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
1306 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
1307 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
1308 information as early as possible to help identify, assess and respond to risks or concerns about the
1309 safety and welfare of children/ young people whether this is when problems are first emerging, or
1310 where a child is already known to local authority children's social care.

1311 6.168. Where the police are involved, wherever possible the school or college should ask the police to obtain
1312 consent from the individuals involved to share their statements and evidence for use in the employer's

- 1313 disciplinary process. This should be done as their investigation proceeds and will enable the police to
1314 share relevant information without delaying the conclusion of their investigation or any court case.
- 1315 6.169. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
1316 whether the child or children named in the allegation need protection or services, so that any
1317 information obtained in the course of those enquiries which is relevant to a disciplinary case can be
1318 passed to the employer without delay.
- 1319 6.170. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
1320 following:
- 1321 • who needs to know and exactly what information can be shared;
 - 1322 • how to manage speculation, leaks and gossip
 - 1323 • what, if any, information can be reasonably given to the wider community to reduce
1324 speculation; and
 - 1325 • how to manage press interest if, and when, it should arise.
- 1326 6.171. Exchange or disclose of personal information with other agencies will be completed in accordance with
1327 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation
1328 including the Data Protection Act 2018 and GDPR which places duty on organisations and individuals
1329 to process personal information fairly and lawfully and to keep the information they hold safe and
1330 secure.
- 1331 6.172. Information relating to individual Safeguarding cases is confidential, although some information can
1332 be shared with relevant staff. This should be done only on a 'need to know' basis.
- 1333 6.173. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data
1334 protection principles, which allow them to share (and withhold) personal information, as provided for
1335 in the Data Protection Act 2018 and the GDPR. This includes:
- 1336 • being confident of the processing conditions which allow them to store and share
1337 information for safeguarding purposes, including information which is sensitive and
1338 personal, and should be treated as 'special category personal data'.
 - 1339 • understanding that 'safeguarding of children and individuals at risk' is a processing
1340 condition that allows practitioners to share special category personal data. This
1341 includes allowing practitioners to share information without consent where there is
1342 good reason to do so, and that the sharing of information will enhance the
1343 safeguarding of a child in a timely manner but it is not possible to gain consent, it
1344 cannot be reasonably expected that a practitioner gains consent, or if to gain consent
1345 would place a child at risk.
 - 1346 • for schools, not providing pupils' personal data where the serious harm test under the
1347 legislation is met. For example, in a situation where a child is in a refuge or another
1348 form of emergency accommodation, and the serious harms test is met, they must
1349 withhold providing the data in compliance with schools' obligations under the Data

- 1350 Protection Act 2018 and the GDPR. Where in doubt schools should seek independent
1351 legal advice.
- 1352 6.174. When sharing safeguarding information regarding an individual, staff will need to consider the
1353 following:
- 1354 • Information should only be shared on a 'need to know' basis when it is in the best
1355 interests of the individual
 - 1356 • Informed consent should be obtained but, if this is not possible and other adults are at
1357 risk of abuse or neglect, it may be necessary to override the requirement
 - 1358 • Distinguish fact from opinion
 - 1359 • Ensure you are giving the right information about the right person
 - 1360 • Ensure you are sharing information securely
 - 1361 • Inform the person that the information has been shared if they were not already aware
1362 of this and if it would not create or increase risk of harm to them/others.
- 1363 6.175. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1364 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1365 need to safeguard and promote the welfare and protect the safety of children.
- 1366 6.176. Further details on information sharing can be found in:
- 1367 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-
1368 busting guide to information sharing
 - 1369 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to
1370 Children, Young People, Parents and Carers](#). The seven golden rules for sharing
1371 information will be especially useful
 - 1372 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and
1373 guidance from the department
 - 1374 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1375 activity, including compliance with the GDPR.
- 1376 6.177. The following wording is to be added to any covering letter where we are sharing documentation:
1377 "The material contained in this letter and its enclosures are confidential to Cambian Group and the
1378 persons named within the documentation. The documentation is delivered only in accordance with a
1379 perceived legal obligation to make the documentation available and upon the strict understanding that
1380 the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not
1381 in any way share the documentation or any details of the information therein contained with any other
1382 party. Any person receiving this information who breaches these obligations of confidentiality will be

1383 held strictly responsible and will be expected to indemnify Cambian Group and any persons named
1384 within the documentation against any losses that may arise as a result of misuse of this material”.

1385 6.178. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details
1386 for the Caldicott Guardian at our location is: *As we are an OFSTED registered children’s home, a*
1387 *Caldicott Guardian is not applicable.*

1388 6.179. Failure to follow this policy and local procedure may result in disciplinary action.

1389 **Complaints and Monitoring**

1390 6.180. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1391 **procedure**, with reference to the our Designated Safeguarding Officer who is Sarah Stacey (DSL) and
1392 West Northamptonshire’s Safeguarding Children’s Board

1393 **7. Accountability**

1394 7.1. Sarah Stacey is the DSL at Cambian Potterspurty Lodge School and Children’s Home and has lead
1395 responsibility for protecting and safeguarding children, young people and young adults and liaising
1396 with the local authority and other local agencies as appropriate. This includes young person
1397 protections, referrals, raising awareness, training, allocating resources and supporting/directing staff
1398 within the Location. In all matters, relating to young person protection and safeguarding, Cambian
1399 Potterspurty Lodge School and Children’s Home will follow the procedures outlined in this policy.

1400 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring
1401 by the Head of Service. Our Managing Director, Insert will undertake a full annual review of the content
1402 and effective application of this policy and associated procedures. The date for the next scheduled
1403 review is set out on page 2. The policy will be reviewed earlier in accordance with changes in
1404 legislation, regulatory requirements or as a result of best practice guidance.

1405 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1406 Compliance, who will support and promote the development of initiatives to improve the prevention,
1407 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1408 also responsible for reporting on safeguarding and providing executive leadership.

1409 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1410 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect
1411 can be stressful and distressing for staff.

1412 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers,
1413 doctors, allied health professionals and nurses) should understand how their professional standards
1414 and requirements underpin their organisational roles to prevent, recognise and respond to abuse and
1415 neglect.

1416 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1417 need to share a common view of what types of behaviour may be abuse or neglect and what should
1418 be an initial response to suspicion or allegation of abuse or neglect.

1419 7.7. All staff **MUST** make sure that they have familiarised themselves with their local multi-agency
1420 safeguarding policy as this policy is designed to complement rather than replace the multi-agency
1421 policies which define the local practice that must be followed.

1422 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1423 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access
1424 contact names and details if required.

1425 **8. Further Safeguarding information – what everyone needs to know** 1426 **(Appendix 12)**

1427 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm.
1428 Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education

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and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues such as child on child/young adult on young

1431 adult abuse staff should be aware of are explored in the **Appendix 12. Further Safeguarding**
1432 **information – what everyone needs to know.**

1433 **9. Appendices**

1434 **Appendix 1: Relevant policies and documents**

- 1435 **1.** Child Protection and Safeguarding
- 1436 a) 25.01 - Index Form for Individuals Concern File
 - 1437 b) 25.02 - Abuse Poster Individual
 - 1438 c) 25.03 - Individual Safeguarding booklet – Easy Read
 - 1439 d) 25.04 - Concern Form
 - 1440 e) 25.05 - Safeguarding Tracking Pack
 - 1441 f) 25.06 – Visitor Information Leaflet template
 - 1442 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
 - 1443 h) 25.08 – Guidance to staff who had an allegation made against them
 - 1444 i) 25.09 – Local Safeguarding procedure
 - 1445 j) 25.10 – Staff Safeguarding Information poster
 - 1446 k) 25.11 – Guidance notes for Designated or On-call person
 - 1447 l) 25.12 – Static body chart
 - 1448 m) 25.13 – Weekly body chart
 - 1449 n) 25.14 – Guidance for Investigating Unexplained Body Marks
 - 1450 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1451 **2.** Whistleblowing
- 1452 **3.** Anti-bullying
- 1453 **4.** Child Sexual Exploitation
- 1454 **5.** Intimate and Invasive Care
- 1455 **6.** Self-harm and suicide
- 1456 **7.** Behaviour Support
- 1457 **8.** Physical Intervention
- 1458 **9.** Complaints Policy
- 1459 **10.** Health
- 1460 **11.** E –safety
- 1461 **12.** Capacity to consent
- 1462 **13.** Prevent
- 1463 **14.** Recruitment

1464	15.	Code of Conduct
1465	16.	Data Protection
1466	17.	Confidentiality
1467	18.	Disciplinary
1468	19.	Code of Practice
1469	20.	Mobile telephony
1470	21.	SUI Caretech children's services process
1471	22.	Caretech - Group Leaving Policy
1472	23.	GHR 02 – Harassment and Bullying
1473	24.	GHR 41 – Reference Requests
1474	25.	GHR 41.1 DBS referral log
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Appendix 2: Legislation and guidance

1480	•	The Children Act 2004, as amended by the Children and Social Work Act 2017
1481	•	Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes (England) Regulations 2015 in force as of 1st April 2015
1482		
1483	•	Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
1484		
1485	•	Prevent Duty Guidance: for England and Wales (March 2015) (Prevent). Prevent is supplemented by The Prevent duty: Departmental advice for schools and young person minders (June 2015) and The use of social media for on-line radicalisation (July 2015)
1486		
1487		
1488	•	The Health and Social Care Act 2008 (Regulated Activities) Regulations 2015
1489	•	Female Genital Mutilation Act 2003, (as inserted by section 74 of the Serious Crime Act 2015)
1490	•	Terrorism Act 2000
1491	•	Counter Terrorism and Security Act 2015
1492	•	The School staffing regulations , England 2009
1493	•	The Teachers Disciplinary regulations, 2012
1494	•	Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.
1495	•	All Wales Child Protection Procedures 2008
1496	•	All Wales POVA Guidance 2008
1497	•	Keeping learners safe GOV.WALES
1498	•	The Care Act 2014
1499	•	Social services and wellbeing Act 2014
1500	•	Working Together to Safeguard Children 2018
1501		Keeping Children Safe in Education 2023
1502	•	Keeping Children Safe in Education 2023 Part 1
1503	•	Regulated activity in relation to children: scope
1504	•	What to do if you're worried a child is being abused
1505	•	Sexual violence and sexual harassment between children in schools and colleges 2021
1506	•	Violence against women and girls

- 1507 • <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>
- 1508 • [Teaching online safety in school.pdf](#)
- 1509 • [Supporting practice in tackling child sexual abuse - CSA Centre](#)

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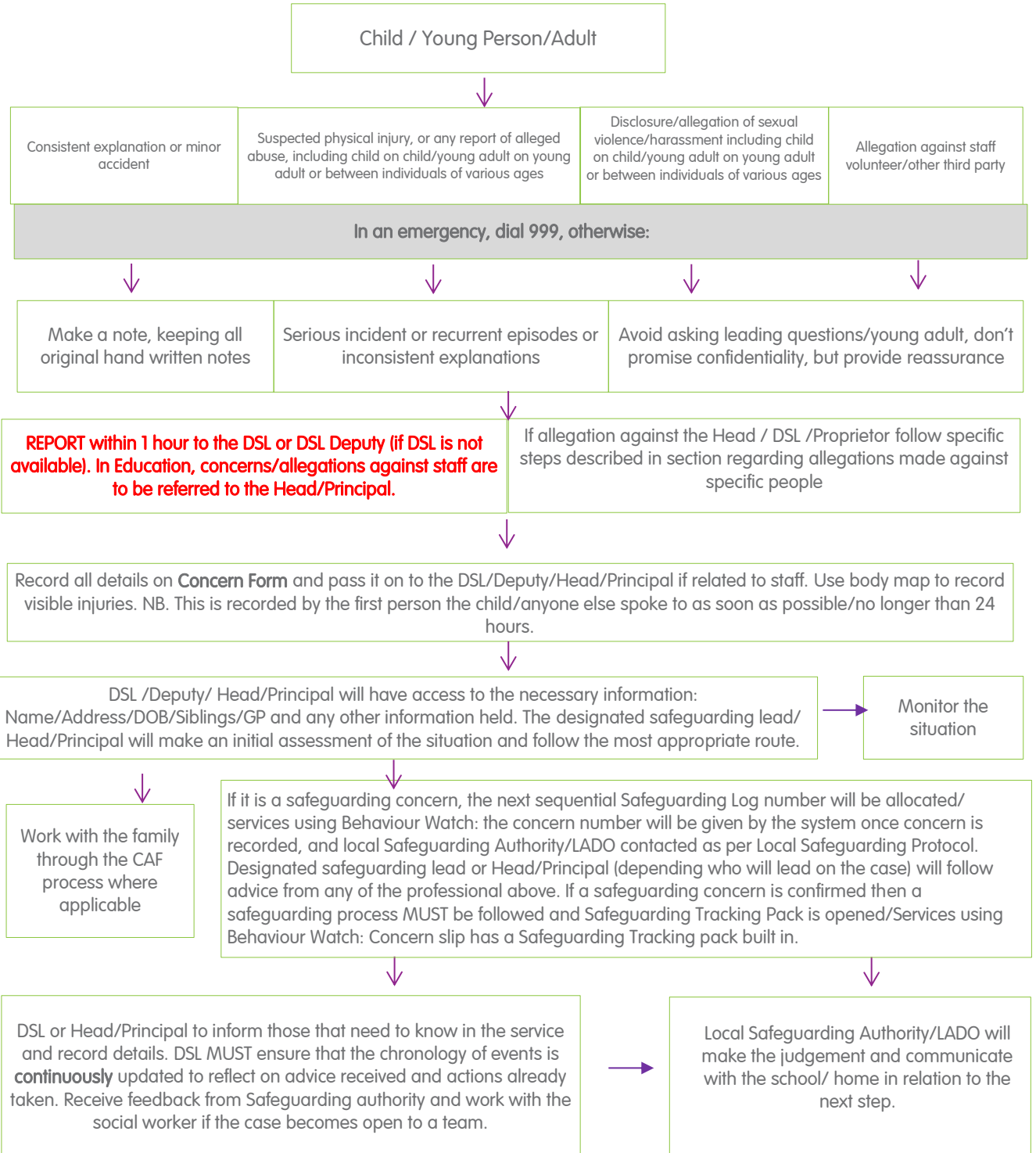


1546 Appendix 3: Child Protection and safeguarding procedure (Flow chart)

1547 DSL – DSL CSC – Children’s Social Care
 1548 CAF – Common Assessment framework LADO – Local Authority Designated Officer
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1599 **Appendix 4: Types of abuse – children**

- 1600 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm
1601 or by failing to act to prevent harm. Children may be abused in a family or in an institutional or
1602 community setting by those known to them or, more rarely, by others. Abuse can take place wholly
1603 online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or
1604 adults or by another child or children
- 1605 • **Physical abuse:** a form of abuse, which may involve hitting, slapping, shaking, throwing, poisoning,
1606 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical
1607 harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces,
1608 illness in a child.
- 1609 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and
1610 adverse effects on the child’s emotional development. It may involve conveying to a child that they are
1611 worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It
1612 may include not giving the child opportunities to express their views, deliberately silencing them or
1613 ‘making fun’ of what they say or how they communicate. It may feature age or developmentally
1614 inappropriate expectations being imposed on children. These may include interactions that are beyond
1615 a child’s developmental capability as well as overprotection and limitation of exploration and learning,
1616 or preventing the child participating in normal social interaction. It may involve seeing or hearing the
1617 ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children
1618 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of
1619 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1620 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for
1621 example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching
1622 outside of clothing. They may also include non-contact activities, such as involving children in the
1623 production of sexual images, forcing children to look at sexual images or watch sexual activities,
1624 encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for
1625 abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can
1626 also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children
1627 or young adults by other young adults or between individuals of different age is a specific safeguarding
1628 issue in education and all staff should be aware of it and of their school or colleges policy and
1629 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,
1633 and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through
1634 violence or the threat of violence. CSE and CCE can affect children, both male and female and can
1635 include children who have been moved (commonly referred to as trafficking) for the purpose of
1636 exploitation Child Sexual Exploitation does not always involve physical contact; it can also occur through
1637 the use of technology.
- 1638 • **Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to
1639 result in the serious impairment of the child’s health or development. Neglect may occur during
1640 pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent
1641 or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or
1642 abandonment); protect a child from physical and emotional harm or danger; ensure adequate
1643 supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care
1644 or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 1645 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through
1646 social media, online games or other channels of digital communication. Children can also be re-
1647 victimised if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number
1648 of illegal abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour;
1649 child sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual
1650 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using
1651 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that
1652 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as
1653 inappropriate behaviours or content online. For instance, children may be bullied online by other
1654 children/young people/young adults they know/others who they don’t know or they might, either

1655 accidentally or intentionally, view content, which is intended for adults. Both online abuse and exposure
1656 to unsuitable content or behaviour can have a long-lasting impact on the wellbeing of children and
1657 young people.

1658 Appendix 5: Types of abuse - adults

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

- 1708 education, employment and criminal justice relating to a protected characteristic, substandard service
1709 provision relating to a protected characteristic.
- 1710 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-
1711 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership
1712 and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and
1713 disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect
1714 for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate
1715 food and drink, or assistance with eating, not offering choice or promoting independence, misuse of
1716 medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of
1717 individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference
1718 with personal correspondence or communication, failure to respond to complaints.
 - 1719 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,
1720 stimulation and activity, personal or medical care, providing care in a way that the person dislikes,
1721 failure to administer medication as prescribed, refusal of access to visitors, not taking account of
1722 individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational
1723 needs, ignoring or isolating the person, preventing the person from making their own decisions,
1724 preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
 - 1725 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of
1726 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,
1727 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise
1728 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more
1729 appropriate under the parts of the Care Act dealing with assessment, planning, information and
1730 advice, and prevention.
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1736 Appendix 6: Signs that someone could be a victim

1737 Physical abuse

- 1738 • No explanation for injuries or an inconsistent account of what happened
- 1739 • Injuries that don't seem likely, given the person's lifestyle
- 1740 • Bruising, cuts, welts, burns, marks on the body or loss of hair in clumps
- 1741 • Frequent injuries
- 1742 • Unexplained falls
- 1743 • Subdued or changed behaviour in the presence of a particular person
- 1744 • Signs of malnutrition (not having enough to eat)
- 1745 • Failure to seek medical treatment or frequent changes of GP

1746 Sexual abuse

- 1747 • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- 1748 • Torn, stained or bloody underclothing
- 1749 • Bleeding, pain or itching in the genital area
- 1750 • Unusual difficulty in walking or sitting
- 1751 • Foreign bodies in genital or rectal openings
- 1752 • Infections, unexplained genital discharge, or sexually transmitted diseases
- 1753 • Pregnancy in a child or young person who cannot consent to sexual intercourse
- 1754 • Using unexpectedly explicit sexual language
- 1755 • Major changes in sexual behaviour or attitude
- 1756 • Incontinence not to do with a medical condition
- 1757 • Self-harming
- 1758 • Poor concentration, withdrawal, sleep disturbance
- 1759 • Excessive fear of or withdrawal from relationships
- 1760 • Fear of receiving help with personal care
- 1761 • Not wanting to be alone with a particular person

1762 Psychological or emotional abuse

- 1763 • An air of silence when a particular person is present
- 1764 • Withdrawal or change in the psychological state of the person
- 1765 • Insomnia (not sleeping)
- 1766 • Low self-esteem
- 1767 • Uncooperative and aggressive behaviour
- 1768 • A change of appetite, weight loss or gain
- 1769 • Signs of distress: tearfulness, anger
- 1770 • Apparent false claims by someone involved with the person, to attract unnecessary treatment

1771 Neglect and acts of omission

- 1772 • Poor environment – dirty or unhygienic
- 1773 • Poor physical condition and/or personal hygiene
- 1774 • Pressure sores or ulcers
- 1775 • Malnutrition or unexplained weight loss
- 1776 • Untreated injuries and medical problems
- 1777 • Inconsistent or reluctant contact with medical and social care organizations
- 1778 • A build-up of medication that hasn't been taken
- 1779 • Uncharacteristic failure to engage in social interaction

1780 Unsuitable clothing or not enough clothes

1781

1782 **Domestic abuse**

- 1783
 - becoming anxious or depressed
- 1784
 - having difficulty sleeping
- 1785
 - complaining of physical symptoms such as tummy aches
- 1786
 - starting to wet their bed
- 1787
 - behaving as though they are much younger than they are
- 1788
 - having problems with school
- 1789
 - becoming aggressive or they may internalise their distress and withdraw from other people
- 1790
 - having a lowered sense of self-worth
- 1791
 - older children may begin to play truant or start to use alcohol or drugs
- 1792
 - they beginning to self-harm by taking overdoses or cutting themselves

1793

1794 **Child on Child/Young adult on young adult abuse/between individuals of different age**

- 1795
 - absence from school or disengagement from school activities
- 1796
 - physical injuries
- 1797
 - mental or emotional health issues
- 1798
 - becoming withdrawn – lack of self esteem
- 1799
 - lack of sleep
- 1800
 - alcohol or substance misuse
- 1801
 - changes in behavior
- 1802
 - inappropriate behavior doe age
- 1803
 - abusive towards others

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Appendix 7: Signs that someone could be an abuser

- 1833 • Using restraint when it's not needed
- 1834 • Having favourites
- 1835 • Giving treats, presents or money to certain people without permission from a manager
- 1836 • Finding ways to spend time with a particular child, young person or young adult, perhaps by working
- 1837 longer hours or giving up free time
- 1838 • Finding ways to spend time alone with a particular child, young person or young adult , for example
- 1839 in a car or somewhere else
- 1840 • Inviting a particular child, young person or young adult at risk to their own house without permission
- 1841 from a manager
- 1842 • Being over-friendly with a child, young person or young adult's parents or guardians without
- 1843 permission from a manager
- 1844 • Taking photos of the child, young person or young adult that aren't for work purposes
- 1845 • Trying to make private contact with a particular child, young person or young adult , including by text,
- 1846 email, mobile phone, online or in letter
- 1847 • Finding ways to have physical contact, like play-fighting or tickling
- 1848 • Keeping collections of toys or other items that might attract children or people at risk
- 1849 • Controlling behaviour
- 1850 • Narcissistic characteristics
- 1851 • Bullying
- 1852 • Being forced into a sexual act
- 1853 • Humiliation
- 1854 • Constant yelling and shouting
- 1855 • The threat or use of violence
- 1856 • Destroying personal items
- 1857 • Limiting contact with family, friends and work colleagues
- 1858 • Checking up on your whereabouts
- 1859 • Accusing the child/young person (the victim), of committing the abuse when it is the other way
- 1860 around.

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1879 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**
 1880 **and recording procedure**

- 1881 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within
 1882 1 hour from the moment of disclosure/report from the child/young person/other person completes and
 1883 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of
 1884 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern
 1885 is related to the staff and the Head/Principal is not available, staff must report their concern to the DSL
 1886 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal
 1887 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally
 1888 before completing the Concern/Safeguarding slip in the system.
- 1889 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details
 1890 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on
 1891 the Concern Form. Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the
 1892 concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened
 1893 (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to
 1894 safeguarding).
- 1895 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy
 1896 or Head/Principal will then also additionally allocate the next sequential Safeguarding Reference
 1897 number on the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern
 1898 form and immediately (or at least within one hour of receiving the concern form, make a referral to the
 1899 local Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to
 1900 discuss the allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the
 1901 Behaviour Watch system will progress to the next stage – Safeguarding part of the concern/SG slip
 1902 which is only accessible to the Safeguarding Team.
- 1903 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a
 1904 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on
 1905 the Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial
 1906 Informal Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy **MUST** ensure that a
 1907 member of their Senior Management Team is assigned to look into the concern. The review must be
 1908 recorded and outcomes shared with the people involved. Feedback from the review session **MUST** be
 1909 provided to local Safeguarding Authority/LADO. Services using the Behaviour Watch system will follow
 1910 the same set of steps apart from populating the Central Log of Concerns and Safeguarding as the log
 1911 can be generated by the system using chosen filtering criteria.
- 1912 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be
 1913 taken. This diligent approach will ensure a clear historic record of contact with local Safeguarding
 1914 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with
 1915 the local Safeguarding Authority/LADO whichever appropriate.
- 1916 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that
 1917 it requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack**
 1918 must be opened with the next sequential Safeguarding Reference included on the form and details as
 1919 such entered on the central log.
- 1920 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking
 1921 Pack being opened, a one record will be created including the original concern, with the whole
 1922 document having the same slip number.
- 1923 • Services which don't use Behaviour Watch or where the concern/allegation is about the Head/Principal
 1924 or the DSL who have access to BW: Copy of **25.05 Safeguarding Tracking Pack** (initially with completed
 1925 sec. 1-5) should be submitted to the **Responsible/Nominated Individual and** in day schools - **Regional**
 1926 **Education Manager** as a follow up to the initial reporting telephone contact. STP must be sent again to
 1927 **Responsible/Nominated Individual and Regional Education Manager** on completion, providing
 1928 detailed overview of the actions taken and the final outcome. Services using the Behaviour Watch will
 1929 be able to trigger live notification to the Regional Manager (Education/Care), Responsible/Nominated
 1930 Individual and Registered Manager – where appropriate. The **Responsible/Nominated Individual and**

- 1931 **Regional Education Manager** in day schools will update relevant Directors. This original form will be
1932 saved in the Safeguarding file/Behaviour Watch – Concern/SG module.
- 1933 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the
1934 local Police should be informed immediately as well and they can take immediate protective action as
1935 necessary.
- 1936 • If the matter is a more general concern then ensure that the ‘Action Taken’ log on the concern form is
1937 completed and the form is filed within the Safeguarding file. Either way the form must be signed by
1938 the DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use
1939 Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people,
1940 staff or children/young people and staff.
- 1941 • The relevant concern form should be referenced in the Individual’s **25.01 Index form for Individual**
1942 **concern/safeguarding file** and the site’s **25.07 Central Log of Concerns and Safeguarding**. Services
1943 using Behaviour Watch will be able to filer information per chosen criteria and also generate reports
1944 per each child/young person in the school, college, children’s or care homes.
- 1945 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking**
1946 **Pack /Behaviour Watch Concern/SG module**.
- 1947 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed
1948 in writing that the concern is closed and Responsible/Nominated Individual and Regional Education
1949 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is
1950 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-**
1951 **off have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the
1952 **Safeguarding file.**
- 1953 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local
1954 Authority and/or the police. The individual can be kept in their care home or on the school/college site
1955 fully supported (e.g. if they are a day student) if advised to do so.
- 1956 • The parent/carers should be informed and a decision should be made with the Local Authority and the
1957 Police about what action is to be taken and whom by.
- 1958 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been
1959 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute
1960 an abuse referral but may help to clarify the situation but they must record all details of any
1961 conversation and advice received on a concern form. He/she can then move to a formal referral or
1962 actively monitor the situation.
- 1963 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or
1964 allegation of abuse directed against anyone working within the establishment. The establishment
1965 **MUST** not internally investigate any allegations of abuse without first taking instruction from the local
1966 Safeguarding Authority/LADO.
- 1967 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal
1968 management investigation (level 2), the investigation process will commence.
- 1969 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the
1970 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps
1971 to assist the external agency to ensure the investigation is completed without a delay.
- 1972 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within
1973 the time frame specified by their regulator. This is regardless of who leads on the investigation and
1974 whether or not the investigation has been concluded.
- 1975 • If as the result of an investigation there has been a substantiated allegation against a member of staff,
1976 we will work with the local Safeguarding Authority/LADO to determine whether there are any
1977 improvements to be made to our safeguarding policy, procedures and practice to prevent similar



1978 events in the future. Also, we will work with our internal Human Resources department and may
1979 commence proceedings under **GHR 27. Disciplinary policy and procedure.**

- 1980
- We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.
- 1981 Records are kept of all conversations as part of the investigation process and made available as
1982 required.

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Appendix 9: Key contacts

2019

DSL is Sarah Stacey

2021

Telephone (24hrs) 07840 023235

Email: sarah.stacey@cambianguroup.com

2023

DSL Deputy is Josh Mayer

2025

2026

Email: joshua.mayer@cambianguroup.com

2027

2028

Headteacher/Principal Sarah Stacey

2030

Telephone (24hrs) 07840 023235

Email: sarah.stacey@cambianguroup.com

2032

2033

Head of Home Care is Claire Murr

2035

Telephone (24hrs) 07584 131761

Email: claire.murr@cambianguroup.com

2037

Operations Director is Graham Norris

2039

Telephone (24hrs) 07580 864354

Email: graham.norris@cambianguroup.com

2041

Managing Director is Christopher Strong

2043

2044

Email: christopher.strong@cambianguroup.com

2045

Group Executive Director – Children’s Services is Jeremy Wiles

2047

Telephone: 07919 023207

Email: jeremy.wiles@caretech-uk.com

2049

Group Lead Safeguarding is Christina Leath (Compliance and Regulation)

2051

Telephone: 01707 601 800

Email: Christina.Leath@caretech-uk.com

2053

Representative, Proprietor - Caretech Education Services is Andrew Sutherland – Operations Director-Education Services

2056

Telephone: 07701314378

Email: Andrew.Sutherland@caretech-uk.com

2058

Local authority

2060

West Northamptonshire County Council & Northamptonshire Safeguarding Children’s Partnership

2062

West Northamptonshire County Council & Northamptonshire Safeguarding Adults’ Board

2064

Telephone: 01604 365681

Telephone to report a safeguarding concern: West Northants Council 0300 1267000

2067

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

2069

Outside of office hours

2071

Northamptonshire Police 999

2073

The non-emergency police telephone number is: 101.

2075



2076 **For young people under the age of 18:**

2077

2078 The Local Authority Designated Officer (LADO) is Andy Smith

2079 Email: andrew.smith@NCTrust.co.uk

2080

2081 Telephone 01604 362993 (Office hours: Monday-Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm Outside of office

2082 hours/weekends, the emergency duty team can be contacted on: 01604 837999.

2083

2084 **Local Safeguarding Authority**

2085 The name, address and contact details for the Local Safeguarding Board is as follows:

2086

2087 **Address:** Northamptonshire Safeguarding Children's Partnership

2088 c/o Northamptonshire County Council, One Angel Square, 4 Angel Street, Northampton, NN1 1ED

2089

2090 **Telephone (24hrs):** 07872 148334

Email: nscp@northnorthants.gov.uk

2091

2092 WASH team on: 0300 1261000. If outside office hours, please contact the Emergency Duty Team on 01604 837999

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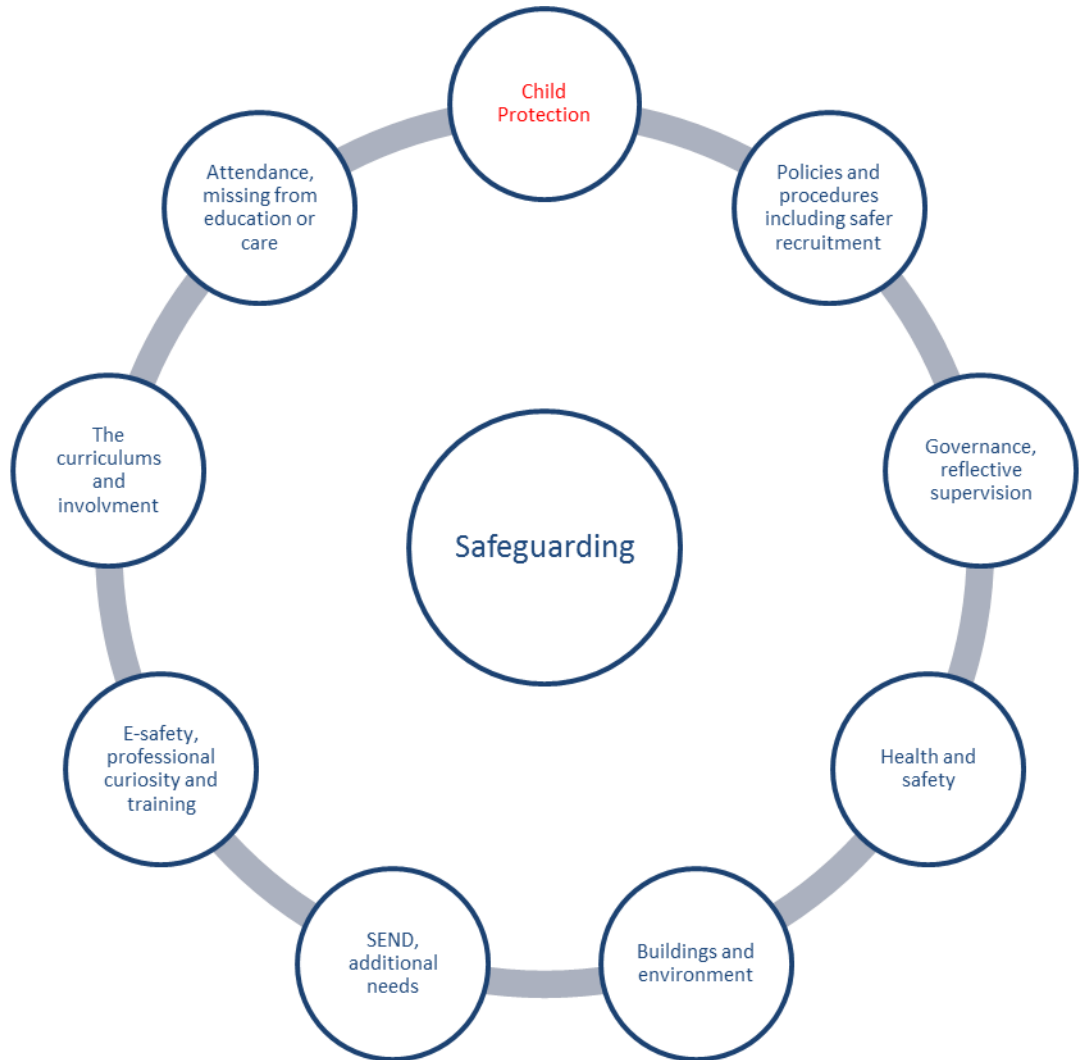
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Appendix 10. Safeguarding in children's Services - illustration



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2149 **Appendix 11. Low – level concerns (Education)**

2150 9.1. As part of their whole school or college approach to safeguarding, schools and colleges should ensure
2151 that they promote an open and transparent culture in which all concerns about all adults working in or
2152 on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with
2153 promptly and appropriately.

2154 9.2. The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern
2155 – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ -
2156 that an adult working in or on behalf of the school or college may have acted in a way that:

2157 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
2158 and

2159 • does not meet the harm threshold or is otherwise not serious enough to consider a referral to
2160 the LADO.

2161 Examples of such behaviour could include, but are not limited to:

2162 • being over friendly with children

2163 • having favourites

2164 • taking photographs of children on their mobile phone, contrary to school policy

2165 • engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or

2166 • humiliating pupils.

2167 **Sharing Low - level concerns**

2168 9.3. Schools must have their site procedure for sharing low-level concerns which is clear, easy to
2169 understand and implement.

2170 9.4. Whether all low-level concerns are shared initially with the DSL (or other nominated person for example
2171 DSL deputy or with the head teacher/principal is a matter for the school or college to decide. If the
2172 former, then the DSL/DSL Deputy should inform the head teacher/principal of all the low-level concerns
2173 and in a timely fashion according to the nature of each particular low-level concern. **The head**
2174 **teacher/principal should be the ultimate decision maker in respect of all low-level concerns**, although
2175 it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in
2176 some schools/colleges, the head teacher/principal may wish to consult with the DSL and take a more
2177 collaborative decision-making approach. Some schools’ or college’s Head teacher/Principal is also the
2178 DSL in which case all low – level concerns should be reported to them or other nominated person for
2179 example DSL Deputy).

2180 9.5. Low-level concerns which are shared about supply staff and contractors should be notified to their
2181 employers, so that any potential patterns of inappropriate behaviour can be identified.

2182 9.6. If schools and colleges are in any doubt as to whether the information which has been shared about
2183 a member of staff as a low-level concern in fact meets the harm threshold, they should consult with
2184 their LADO.

2185 9.7. Schools and colleges should ensure they create an environment where staff are encouraged and feel
2186 confident to self-refer, where, for example, they have found themselves in a situation which could be
2187 misinterpreted, might appear compromising to others, and/or on reflection they believe they have
2188 behaved in such a way that they consider falls below the expected professional standards.

2189 9.8. Creating a culture in which all concerns about adults (including allegations that do not meet the harms
2190 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is

2191 critical. If implemented correctly, this should encourage an open and transparent culture; enable
2192 schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise
2193 the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear
2194 about professional boundaries and act within these boundaries, and in accordance with the ethos and
2195 values of the institution.

21 Responding to low - level concerns

2197 9.9. If the concern has been raised via a third party, the head teacher/principal (or a nominated deputy)
2198 should collect as much evidence as possible by speaking:

- 2199 • directly to the person who raised the concern, unless it has been raised anonymously, and
- 2200 • to the individual involved and any witnesses.

2201 9.10. The information collected will help them to categorise the type of behaviour and determine what further
2202 action may need to be taken. This information needs to be recorded in writing along with the rationale
2203 for their decisions and action taken.

22 Recording low - level concerns

2205 9.11. All low-level concerns should be recorded in writing. The Concern/Safeguarding slip in Behaviour
2206 Watch should be completed, as this is the place to record all concerns being raised. The record should
2207 include details of the concern, the context in which the concern arose, and action taken. The name of
2208 the individual sharing their concerns should also be noted, if the individual wishes to remain
2209 anonymous then that should be respected as far as reasonably possible.

2210 9.12. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or
2211 concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or
2212 college should decide on a course of action, either through its disciplinary procedures or where a
2213 pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it
2214 should be referred to the LADO.

2215 9.13. Consideration should also be given to whether there are wider cultural issues within the school or
2216 college that enabled the behaviour to occur and where appropriate policies could be revised, or extra
2217 training delivered to minimise the risk of it happening again.

2218 9.14. It is for schools and colleges to decide how long they retain such information, but it is recommended
2219 that it is retained at least until the individual leaves their employment.

2220

2221 **Appendix 12. Further Safeguarding information – what everyone needs to know**

2222 **Contextual safeguarding**

2223 9.15. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s
2224 experiences of significant harm beyond their families. It recognises that the different relationships that
2225 young people form in their neighbourhoods, schools, colleges, children’s/care homes and online can
2226 feature violence and abuse. Parents and carers have little influence over these contexts, and young
2227 people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore,
2228 children’s social care practitioners need to engage with individuals and sectors who do have influence
2229 over/within extra- familial contexts, and recognise that assessment of, and intervention with, these
2230 spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the
2231 objectives of child protection systems in recognition that young people are vulnerable to abuse in a
2232 range of social contexts.

2233 9.16. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors
2234 outside the school or college and/or can occur between children outside of these environments. All
2235 staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or
2236 exploitation in situations outside their families. Extra-familial harms take a variety of different forms and
2237 children can be vulnerable to multiple harms including (but not limited to) sexual exploitation (including
2238 harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship
2239 abuse), criminal exploitation, and serious youth violence, county lines and radicalisation. Further
2240 advice is provided in the [Home Office’s Preventing youth violence and gang involvement](#) and its
2241 [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

2242 9.17. All staff should be aware that technology is a significant component in many safeguarding and
2243 wellbeing issues. Children are at risk of abuse and other risks online as well as face-to-face. In many
2244 cases abuse and other risks will take place concurrently both online and offline. Children can also
2245 abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist
2246 messages, the non-consensual sharing of indecent images, especially around chat groups, and the
2247 sharing of abusive images and pornography, to those who do not want to receive such content.

2248 9.18. Children’s social care assessments should consider where children are being harmed in contexts
2249 outside the home (family home, children’s/care home), so it is important that schools, colleges and
2250 children’s/care homes provide as much information as possible as part of the referral process. This will
2251 allow any assessment to consider all the available evidence and enable a contextual approach to
2252 address such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

2253 9.19. We will consider the various factors that have an interplay with the life of any child/young person about
2254 whom we have concerns within the setting and the level of influence that these factors have on their
2255 ability to be protected and remain free from harm particularly when it comes to child exploitation or
2256 criminal activity.

2257 9.20. Whilst this term applies to this specific definition, the notion of considering a child/young person within
2258 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the
2259 school, college, children’s/care home gates, within their family home when they visit (children attending
2260 residential education), within the family (day students) and within the community (extracurricular off
2261 site activities, events, groups and clubs) are key considerations when the DSL is looking at any
2262 concerns.

2263 **Bullying**

2264 9.21. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure**
2265 acknowledges that to allow or condone bullying may lead to consideration under child protection
2266 procedures. Bullying is a safeguarding matter that if left unresolved can become a child protection

2267 matter. Our settings take seriously any bullying concerns and both investigate and act to protect
2268 Individuals where appropriate.

2269 **Child on child/young adults on young adult/ between children of different age's abuse**

2270 9.22. Boarding schools, residential special schools, residential colleges and children's homes and care
2271 homes for young adults attending education (FE colleges) have additional factors to consider with
2272 regard to safeguarding. Schools and colleges that provide such residential accommodation and/or
2273 are registered as children's homes should be alert to signs of abuse in such settings (for example,
2274 inappropriate pupil or student relationships and the potential for the abuse between individuals of the
2275 same/similar age or different age, particularly in schools and colleges where there are significantly
2276 more girls than boys or vice versa) and work closely with the host local authority and, where relevant,
2277 any local authorities that have placed their children there. All residential setting within the Organisation
2278 children's service will continuously maintain their communication with the internal and external
2279 Education providers to ensure the additional factors are being considered and any concerns shared in
2280 a timely manner and with the right people.

2281 9.23. All staff should be aware that children can abuse other children/young adults can abuse other young
2282 adults and that the abuse can also take place between individuals of different age and that it can
2283 happen both inside and outside of school/college/children's/care home and online. It is important that
2284 all staff recognise the indicators and signs of the abuse and know how to identify it and respond to
2285 reports. In some schools, colleges, children's / care homes site – based or regional members of therapy
2286 teams might need to be involved and support the SLT to identify the most effective ways of
2287 communication with the child/young adult who may have potentially been the victim of child on
2288 child/young adult on young adult/ between individuals of different age abuse and who instigated it.

2289 9.24. It must be recognised that children and young people would require varied approaches and
2290 communication mechanisms to be present and available so they can report abuse. Children must be
2291 regularly reassured that their concern/reports will be treated seriously every time they report it.

2292 9.25. Children needs to be told what will happen from the moment their concern is shared, so the lack of
2293 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.
2294 Children need to know that that their concerns will be investigated and dealt with. Child's/young
2295 person's preference in terms of how feedback should be provided must be taken into consideration so
2296 this can be planed for in advance.

2297 9.26. The communication with each individual throughout the process of child on child/young adult on young
2298 adult or between individuals of different age investigation must be regular, proportionate and take
2299 place using suitable communication.

2300 9.27. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't
2301 receive timely and appropriate support from the school/college, hence the communication and support
2302 must become one of the critical points of a significant priority to those responding to and those

- 2303 managing child on child/young adult on young adult/between individuals of different age abuse cases
2304 including those of a sexual nature. Other consideration for all providers were:
- 2305
 - to assume it is happening here and plan accordingly
 - 2306
 - work on and strengthen the whole school, college, children's/care home approach to
 - 2307 developing a safeguarding culture
 - 2308
 - to ensure staff model respectful behaviour
 - 2309
 - to ensure children and young people are clear about acceptable and unacceptable behaviour
 - 2310
 - to ensure children/young people are confident to ask for help
 - 2311
 - to ensure carefully planned and implemented RSHE curriculum
 - 2312
 - to ensure the behavioural approach with sanctions & interventions for poor behaviour
 - 2313
 - to have mechanisms to support students who need it in the way they need it
 - 2314
 - to ensure staff have access to suitable training & that there is clear expectation for staff and
 - 2315 Managers
 - 2316
 - to ensure pupil's voice is heard and responded to
 - 2317
 - to ensure DSLs have some protected time to engage with local safeguarding partners and
 - 2318 LADOs, so those relationships can be strengthened.
 - 2319
 - to ensure staff follow the guidance in Keeping Children Safe in Education
 - 2320
 - 2321 9.28. All staff should understand that even if there are no reports in their schools or colleges it does not mean
2322 it is not happening, it may be the case that it is just not being reported. As such, it is important if staff
2323 have any concerns regarding child on child/young adult on young adult abuse or abuse between
2324 individuals of different age, they should speak to their DSL (or deputy).
 - 2325 9.29. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2326 harassment. Staff must NOT take the view that it doesn't not happen in their setting.
 - 2327 9.30. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but
2328 that all types of abuse between children of the same, similar of different ages is unacceptable and will

2329 be taken seriously. It is essential that all victims are reassured that they are being taken seriously and
2330 that they will be supported and kept safe.

2331 9.31. Abuse between individuals of the same, similar or different age is most likely to include, but may not
2332 be limited to:

2333

2334 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);

2335 • abuse in intimate personal relationships between peers

2336 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical
2337 harm (this may include an online element which facilitates, threatens and/or encourages physical
2338 abuse)

2339 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2340 element which facilitates, threatens and/or encourages sexual violence). For further information
2341 about sexual violence see [Part 5 of KCSIE 2023 and Annex B](#)

2342 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which
2343 may be standalone or part of a broader pattern of abuse; For further information about sexual
2344 harassment see [Part 5 of KCSIE 2023 and Annex B](#)

2345 • causing someone to engage in sexual activity without consent, such as forcing someone to strip,
2346 touch themselves sexually, or to engage in sexual activity with a third party

2347 • consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also
2348 known as sexting or youth produced sexual imagery). For more information about this read UKCIS
2349 guidance: [Sharing nudes and semi-nudes advice for education settings](#).

2350 • Upskirting which typically involves taking a picture under a person's clothing without their permission,
2351 with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the
2352 victim humiliation, distress or alarm; and

2353 9.32. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2354 humiliation used as a way of initiating a person into a group and may also include an online element)

2355 9.33. Staff must be clear as to the school/college's/home's procedures with regards to child on child/young
2356 adult on young adult abuse, abuse between individuals of different age and the important role they
2357 have to play in preventing it and responding where they believe a child may be at risk from it.

2358 9.34. All Individuals will be provided with safeguarding information in a format, which is appropriate for their
2359 understanding and communication. This may take the form of posters or a leaflet/booklet.

2360 9.35. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
2361 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be
2362 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
2363 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated
2364 or acceptable. However, it is critical to state that some children with cognitive impairment may not be
2365 able to fully understand how children on the receiving end of such behaviour may feel, therefore staff
2366 will work with each of the children affected by the situation in order to enhance their understanding of
2367 the seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

2368

Serious violence

2369 9.36. All staff should be aware of the indicators, which may signal children are at risk from, or are involved
2370 with serious violent crime. These may include increased absence from school, a change in friendships
2371 or relationships with older individuals or groups, a significant decline in performance, signs of self-
2372 harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts
2373 or new possessions could also indicate that children have been approached by, or are involved with;
2374 individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

2375 9.37. All staff should be aware of the range of risk factors which increase the likelihood of involvement in
2376 serious violence, such as being male, having been frequently absent or permanently excluded from
2377 school, having experienced child maltreatment and having been involved in offending, such as theft or

- 2378 robbery. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence
2379 and gang involvement and its [Preventing youth violence and gang involvement](#).
- 2380 9.38. Sexual violence and sexual harassment can occur between two or more children of any age and sex,
2381 from primary through to secondary stage and into college. It can occur also through a group of children
2382 sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual
2383 harassment exist on a continuum and may overlap; they can occur online and face-to-face (both
2384 physically and verbally) and are never acceptable. Schools and colleges should be aware of the
2385 importance of:
- 2386 • making clear that there is a zero-tolerance approach to sexual violence and sexual
2387 harassment that it is never acceptable, and it will not be tolerated. It should never be passed
2388 off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to
2389 do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst-
2390 case scenarios a culture that normalises abuse, leading to children accepting it as normal and
2391 not coming forward to report it.
 - 2392 • recognising, acknowledging, and understanding the scale of harassment and abuse and that
2393 even if there are no reports it does not mean it is not happening, it may be the case that it is
2394 just not being reported.
 - 2395 • challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms,
2396 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or
2397 tolerating such behaviours risks normalising them.
- 2398 9.39. Sexual violence and sexual harassment between children can occur between two children of **any age**
2399 **and sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur
2400 through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2401 9.40. Children who are victims of sexual violence and sexual harassment will likely find the experience
2402 stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and
2403 will be exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same
2404 children’s/care home. Sexual violence and sexual harassment exist on a continuum and may overlap;
2405 they can occur online and face to face (both physically and verbally) and are never acceptable. All staff
2406 working with children are advised to maintain an attitude of ‘it could happen here’.
- 2407 9.41. It is essential that all victims are reassured that they are being taken seriously and that they will be
2408 supported and kept safe. **A victim should never be given the impression that they are creating a**
2409 **problem by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel
2410 ashamed for making a report.
- 2411 9.42. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential
2412 that victims are protected, offered appropriate support and every effort is made to ensure their
2413 education is not disrupted. It is also important that other children, adult students and school and college
2414 staff are supported and protected as appropriate.
- 2415 9.43. There is support available for schools and colleges. [Part 5 of KCSIE 2023 p110](#) provides detailed
2416 information and links to resources.
- 2417 9.44. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children
2418 with special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2419 9.45. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.
2420 However, children who are LGBT can be targeted by other children. In some cases, a child who is

- 2421 perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children
2422 who identify as LGBT.
- 2423 9.46. Risks can be compounded where children/young people who are LGBT lack a trusted adult with whom
2424 they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and
2425 provide a safe space for them to speak out or share their concerns with members of staff.
- 2426 9.47. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and](#)
2427 [Health Education](#) curriculum and there is a range of support available to help schools counter
2428 homophobic, biphobic and transphobic bullying and abuse.
- 2429 9.48. Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected
2430 to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour
2431 is developmentally inappropriate and may cause developmental damage. An umbrella term for these
2432 types of behaviour are often referred to as “**harmful sexual behaviour**”. The term has been widely
2433 adopted in child protection. Harmful sexual behaviour can occur online and/or offline and can also
2434 occur simultaneously between the two. Harmful sexual behaviour should be considered in a child
2435 protection context.
- 2436 9.49. Situations where children/young people are forced or coerced into sexual activity by peers or
2437 associates can be related with gang / serious youth violence activity but that is not always the case.
2438 Peer influence or peer pressure is a major factor in the decisions made by young people to join
2439 particular groups. Many young people see it as a “way out” from their day-to-day life and feel a strong
2440 bond with their peers, one which they may be lacking at home. Examples of peer-on-peer abuse
2441 including sexualised online bullying include:
- 2442 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and
2443 psychological, that makes a person feel unwelcome, marginalised, excluded,
2444 powerless or worthless because of their colour, ethnicity, culture, faith community,
2445 national origin or national status.
 - 2446 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where
2447 sexuality or gender is used as a weapon by boys or girls, this may also include any of
2448 the following:
 - 2449 - spreading rumors about someone's alleged sex life
 - 2450 - using offensive terms to describe a person
 - 2451 - inappropriate touching or attempts to do so
 - 2452 - non-consensual sharing of sexual images and videos
 - 2453 - unwanted sexual comments and messages, including those on social media
 - 2454 - any sexual exploitation, coercion and threats
 - 2455 - sexual assault and rape
 - 2456 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or
2457 knowledge, with the intention of viewing their genitals or buttocks (with or without
2458 underwear) to obtain sexual gratification, or cause the victim humiliation, distress or
2459 alarm. It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism
2460 Offences Act, which was commonly known as the Upskirting Bill, was introduced on 21
2461 June 2018. It came into force on 12 April 2019.
 - 2462 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are
2463 transgender, thought to be transgender, or whose gender expression doesn’t conform

- 2464 to traditional gender roles. Transphobia can prevent transgender and gender
2465 nonconforming people from living full lives free from harm.
- 2466 • **Homophobic Bullying** - targets someone because of their sexual orientation (or
2467 perceived sexual orientation);
 - 2468 • **Disablist Bullying** - targets a young person solely based on their disability. This can
2469 include manipulative bullying where a perpetrator forces the victim to act in a certain
2470 way, or exploiting a certain aspect of the victim's disability.
 - 2471 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect
2472 attitude (usually negative) towards an individual based solely on the individual's
2473 membership of a social group. For example, a person may hold prejudiced views
2474 towards a certain race or gender etc. (e.g. sexist).
 - 2475 • **Discrimination** is the behaviour or actions, usually negative, towards an individual or
2476 group of people, especially on the basis of sex/race/social class.
- 2477 9.50. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE 2023 Part 5:](#)
2478 [Child on child sexual violence and harassment](#)
2479 What staff should do if they have concerns about the child/young person
- 2480 9.51. Staff working with children/young people are advised to maintain an attitude of 'it could happen here'
2481 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff
2482 should always act in the best interests of the child/young person
- 2483 9.52. If staff have any concerns about a child's/young person welfare, they should act on them immediately
2484 by following this procedure and reporting their concern to the DSL/DSL Deputy.
- 2485 **Opportunities to teach safeguarding**
- 2486 9.53. Schools/colleges must ensure that their staff undergo regular updated safeguarding training, including
2487 online safety and for children to be taught about how to keep themselves and others safe, including
2488 online, that safeguarding training for staff, including online safety training, is integrated, aligned and
2489 considered as part of the whole school or college safeguarding approach and wider staff training and
2490 curriculum planning.
- 2491 9.54. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities
2492 of individual children/young people, including those who are victims of abuse, and children/young
2493 people with special educational needs or disabilities.
- 2494 9.55. Whilst considering the above training requirements, governance boards and proprietor should have
2495 regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour
2496 effectively to ensure a good and safe educational environment and requires teachers to have a clear
2497 understanding of the needs of all pupils.
- 2498 9.56. Schools and colleges play a crucial role in preventative education. Preventative education is most
2499 effective in the context of a whole-school or college approach that prepares pupils and students for life
2500 in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia,
2501 biphobic and sexual violence/harassment.
- 2502 9.57. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may
2503 cover relevant issues through tutorials). This may include covering relevant issues for schools through
2504 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary
2505 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be
2506 found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and
2507 health education.](#)
- 2508 9.58. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:
2509 [Teaching about relationships sex and health](#). This includes teacher-training modules on the RSHE topics

- 2510 and non-statutory implementation guidance. The following resources plus many more listed in [Annex](#)
2511 [B](#), may also help schools and colleges understand and teach about safeguarding:
- 2512 • DfE advice for schools: [teaching online safety in schools](#);
- 2513 • UK Council for Internet Safety (UKCIS)³² guidance: [Education for a connected world](#);
- 2514 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working](#)
2515 [with children and young people](#);
- 2516 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the
2517 maximum impact of any online safety sessions delivered by external visitors;
- 2518 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2519 • LGFL '[Undressed](#)' provided schools advice about how to teach young children about
2520 being tricked into getting undressed online in a fun way without scaring them or
2521 explaining the motives of sex offenders.
- 2522 • Public Health England: [Every Mind Matters](#)
- 2523 • [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any
2524 online challenges and hoaxes, sharing information with parents and carers and where
2525 to get help and support.
- 2526 9.59. Whilst it is essential that governance boards and proprietor ensure that appropriate filters and
2527 monitoring systems are in place, they should be careful that "over blocking" does not lead to
2528 unreasonable restrictions as to what children can be taught with regard to online teaching and
2529 safeguarding
- 2530 9.60. As schools and colleges increasingly work online, it is essential that children are safeguarded from
2531 potentially harmful and inappropriate online material. Whilst it is essential that governance boards and
2532 proprietor ensure that appropriate filters and monitoring systems are in place, they should be careful
2533 that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with
2534 regard to online teaching and safeguarding
- 2535 **Online safety**
- 2536 9.61. It is essential that children are safeguarded from potentially harmful and inappropriate online material.
2537 An effective whole school and college approach to online safety empowers a school or college to
2538 protect and educate pupils, students, and staff in their use of technology and establishes mechanisms
2539 to identify, intervene in, and escalate any concerns where appropriate.
- 2540 9.62. The breadth of issues classified within online safety is considerable, but can be categorised into four
2541 areas of risk which we'll refer to as 4Cs later on:
- 2542 • **content:** being exposed to illegal, inappropriate or harmful content, for example:
2543 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism,
2544 radicalisation and extremism.
- 2545 • **contact:** being subjected to harmful online interaction with other users; for example: peer
2546 to peer pressure, commercial advertising and adults posing as children or young adults
2547 with the intention to groom or exploit them for sexual, criminal, financial or other
2548 purposes'.
- 2549 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for
2550 example, making, sending and receiving explicit images (e.g. consensual and non-

2551 consensual sharing of nudes and semi-nudes and/or pornography, sharing other
2552 explicit images and online bullying; and

2553 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or
2554 financial scams. If you feel your pupils, students or staff are at risk, please report it to the
2555 Anti-Phishing Working Group <https://apwg.org/>

2556 9.63. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising
2557 and implementing policies and procedures. This will include considering how online safety is reflected
2558 as required in all relevant policies and considering online safety whilst planning the curriculum, any
2559 teacher training, the role and responsibilities of the DSL and any parental engagement.

2560 **Online safety policy**

2561 9.64. Online safety and the school or college's approach to it should be reflected in the child protection policy.
2562 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college
2563 should have a clear policy on the use of mobile and smart technology. Amongst other things this will
2564 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone
2565 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually
2566 harass their peers via their mobile and smart technology, share indecent images: consensually and
2567 non-consensually (often via large chat groups), and view and share pornography and other harmful
2568 content. Schools and colleges should carefully consider how this is managed on their premises and
2569 reflect in their mobile and smart technology policy and their child protection policy.

2570 9.65. Information and support available to schools and colleges to keep children safe online can be found
2571 in [Part 2 and Annex B of KCSIE 2023](#).

2572 **Remote Learning**

2573 9.66. The DfE has provided advice to support schools and colleges to help keep pupils, students and staff
2574 safe whilst learning remotely, [safeguarding in schools colleges and other providers](#) and [safeguarding](#)
2575 [and remote education](#). The NSPCC also provide helpful advice - [Undertaking remote teaching safely](#).
2576 NSPCC Learning - [Undertaking remote teaching safely during school closures](#).

2577 9.67. Schools and colleges are likely to be in regular contact with parents and carers. Those communications
2578 should be used to reinforce the importance of children being safe online and parents and carers are
2579 likely to find it helpful to understand what systems schools and colleges use to filter and monitor online
2580 use. It will be especially important for parents and carers to be aware of what their children are being
2581 asked to do online, including the sites they will asked to access and be clear who from the school or
2582 college (if anyone) their child is going to be interacting with online

2583 **Filters and monitoring**

2584 9.68. Whilst considering their responsibility to safeguard and promote the welfare of children and provide
2585 them with a safe environment in which to learn, governance boards and proprietor should be doing
2586 all that they reasonably can to limit children's exposure to the above risks from the school's or college's
2587 IT system. As part of this process, governance boards and proprietor should ensure their school or
2588 college has appropriate filters and monitoring systems in place. Governance boards and proprietor
2589 should consider the age range of their children, the number of children, how often they access the IT
2590 system and the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech
2591 IT team and seek advice and support required.

2592 9.69. The appropriateness of any filters and monitoring systems are a matter for individual schools and
2593 colleges and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK
2594 Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might
2595 look like UK Safer Internet Centre: [appropriate filtering and monitoring](#).

2596 **Information security and access management**

2597 9.70. Education settings are directly responsible for ensuring they have the appropriate level of security
2598 protection procedures in place, in order to safeguard their systems, staff and learners and review the

2599 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
2600 Guidance on e-security is available from the National Education Network. In addition, broader
2601 guidance on cyber security including considerations for governors and trustees can be found at
2602 NCSC.GOV.UK.

2603 **Reviewing online safety**

2604 9.71. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should
2605 consider carrying out an annual review of their approach to online safety, supported by an annual risk
2606 assessment that considers and reflects the risks their children face. A free online safety self-review tool
2607 for schools can be found via the [360 safe website](#).

2608 9.72. UKCIS has published [online safety in schools and colleges: Questions from the governing board](#). The
2609 questions can be used to gain a basic understanding of the current approach to keeping children safe
2610 online; learn how to improve this approach where appropriate; and find out about tools, which can be
2611 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors
2612 of trainee teachers and newly qualified teachers induct mentees and provide ongoing support,
2613 development and monitoring.

2614 **Cyberbullying**

2615 9.73. Central to Anti-bullying policy is the principle that 'bullying is always unacceptable' and that 'all
2616 children/young people have a right not to be bullied'. School/colleges also recognises that it must take
2617 note of bullying perpetrated outside school/college which spills over into the school/college; therefore

2618 once aware services will respond to any cyber-bullying we become aware of carried out by
2619 children/young people when they are away from the site.

2620 9.74. Cyber-bullying is defined as 'an aggressive, intentional act carried out by a group or individual using
2621 electronic forms of contact repeatedly over time against a victim who cannot easily defend
2622 himself/herself.'

2623 • By cyber-bullying, we mean bullying by electronic media:

2624 • Bullying by texts or messages or calls on mobile 'phones

2625 • The use of mobile 'phone cameras to cause distress, fear or humiliation

2626 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,
2627 personal websites, social networking sites

2628 • Using e-mail to message others

2629 • Hijacking/cloning e-mail accounts

2630 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2631 9.75. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate
2632 defamatory information in any media including internet sites.

2633 9.76. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public
2634 electronic communications network, a message or other matter that is grossly offensive or one of an
2635 indecent, obscene or menacing character.

2636 9.77. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of
2637 conduct amounting to harassment.

2638 9.78. If services become aware of any incidents of cyberbullying, they will need to consider each case
2639 individually as to any criminal act that may have been committed. The services will pass on information
2640 to the police if it feels that it is appropriate or is required to do so.

2641 **Gaming – raising awareness**

2642 9.79. Online gaming is an activity in which the majority of children and young people and many adults get
2643 involved. The services will raise awareness by talking to children/young people/key workers/staff and
2644 also where appropriate parents/carers involved about the games their children play and help them
2645 identify whether they are appropriate.

2646 **Nudes/semi nudes' images or videos**

2647 9.80. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or
2648 others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones,

2649 and laptops - any device that enables the sharing of media and messages. Sexting may also be called:
2650 trading nudes, dirties, pic for pic.

2651 9.81. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the
2652 person doing it is a child. A young person is breaking the law if they:

2653 • take an explicit photo or video of themselves or a friend

2654 • share an explicit image or video of a child, even if it's shared between children of the same age

2655 • possess, download or store an explicit image or video of a child, even if the child gave their
2656 permission for it to be created.

2657 9.82. However, if a young person is found creating or sharing images, the police can choose to record that
2658 a crime has been committed but that taking formal action isn't in the public interest. There are many
2659 reasons why a young person may want to send a naked or semi-naked picture, video or message to
2660 someone else:

2661 • joining in because they think that 'everyone is doing it'

2662 • boosting their self-esteem

2663 • flirting with others and testing their sexual identity

2664 • exploring their sexual feelings

2665 • to get attention and connect with new people on social media

2666 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the
2667 person asking is persistent

2668 9.83. The risks of sexting are that the young person has no control over the images and how these are
2669 shared, and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group
2670 will provide education and guidance to prevent individuals from becoming victims of such situations
2671 by encouraging them to think about the risk of sexting and understand how to seek help when
2672 approached to take part in sexting. More information can be found on [Keeping-children-safe/online-
2673 safety/sexting-sending-nudes](#).

2674 Online reputation

2675 9.84. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed
2676 by posts, photos that have been uploaded and comments made by others on people's profiles. It is
2677 important that children/young people and staff are aware that anything that is posted could influence
2678 their future professional reputation. The majority of organisations and work establishments now check
2679 digital footprint before considering applications for positions or places on courses.

2680 Grooming

2681 9.85. On-line grooming is the process by which one person with an inappropriate sexual interest in
2682 children/young people will approach a child/young person on-line, with the intention of developing a

2683 relationship with that child/young person, to be able to meet them in person and intentionally cause
2684 harm.

2685 9.86. The services will build awareness amongst children/young people, parents/carers and staff about
2686 ensuring that the child/young person:

2687 • Only has friends on-line that they know in real life

2688 • Is aware that if they communicate with somebody that they have met on-line, that relationship
2689 should stay on-line.

2690 9.87. Where appropriate that the services will support parents/carers to:

2691 • Recognise the signs of grooming

2692 • Have regular conversations with their children/young people about on-line activity and how to stay
2693 safe on-line

2694 9.88. Where appropriate the services will raise awareness by:

2695 • Regular communication with the families

2696 • Schools/colleges will include awareness around grooming as part of their curriculum

2697 • Identifying with the families and children/young people how they can be safeguarded against
2698 grooming.

2699 **Violence against women and girls (VAWG)**

2700 9.89. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of
2701 women and girls. The government has a strategy looking at specific issues that women and girls face.

2702 9.90. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier
2703 to equal participation of women and men in social, economic, and political spheres. Such violence
2704 impedes gender equality and the achievement of a range of development outcomes. VAWG is a
2705 complex and multifaceted problem that cannot effectively be addressed from a single vantage point.
2706 The prevention of and response to such violence require coordinated action across multiple sectors.
2707

2708 **Female genital mutilation (FGM)**

2709 9.91. FGM comprises all procedures involving partial or total removal of the external female genitalia or other
2710 injury to the female genital organs for non-medical reasons, hence interferes with the natural function
2711 of girls and women's bodies. It has no health benefits and harms girls and women in many ways.

2712 9.92. The age at which girls undergo FGM varies enormously according to the community in which they live.
2713 The procedure may be carried out when the girl is new born, during childhood or adolescence, just
2714 before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to
2715 take place between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher
2716 risk.

2717 9.93. In 2003, FGM became a criminal offence for UK nationals or permanent UK residents to take their child
2718 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty
2719 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2720 **Forced marriage**

2721 9.94. In the case of children and young people: 'a forced marriage is a marriage in which one or both
2722 spouses cannot consent to the marriage and duress is involved. Duress can include physical,

2723 psychological, financial, sexual and emotional pressure.’ In developing countries, approx. 11% of girls
2724 are married before the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2725 9.95. It is important that all members of staff recognise the presenting symptoms, know how to respond if
2726 there are concerns and where to turn for advice.

2727 9.96. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**
2728 and locally through the local police safeguarding team or children’s social care.

2729 9.97. While all members of staff (education, care, clinical) have important responsibilities with regard to
2730 children, young people or adults who may be at risk of forced marriage, managers and leaders should
2731 not undertake roles in this regard that are most appropriately discharged by other children’s services
2732 professionals such as police officers or social workers.

2733 9.98. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of
2734 forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency
2735 statutory guidance for dealing with forced marriage, which can both be found at [The Right to Choose:
2736 Multi-agency statutory guidance for dealing with forced marriage](#). School and college staff can contact
2737 the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email
2738 fmufcdo.gov.uk.

2739 **Breast ironing**

2740 9.99. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's
2741 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically
2742 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and
2743 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue
2744 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where
2745 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports
2746 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used
2747 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2748 9.100. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and
2749 Safeguarding policy and the Individual offered medical help.

2750 **Teenage relationship abuse**

2751 9.101. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such
2752 as controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone,
2753 telling them what to wear, who they can/can't see or speak to and that this abuse is prevalent within
2754 teen relationships.

2755 9.102. Further research shows that teenagers don’t understand what consent means within their
2756 relationships. They often hold the common misconception that rape can only be committed by a
2757 stranger down a dark alley and don’t understand that it could happen within their own relationships.
2758 This can lead to these abusive behaviours feeling ‘normal’ and therefore unchallenged, as they are not
2759 recognised as being ‘abusive’.

2760 9.103. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of
2761 their own, their peers or others behaviour towards them. Therefore, significant effort will be made to
2762 raise awareness of it and respond effectively to such situations.

2763 9.104. In response to this Cambian Group will provide education and guidance to prevent teenagers from
2764 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views
2765 of violence, abuse and controlling behaviours, and understand what consent means within
2766 relationships.

2767 **Honour-based violence**

2768 9.105. It is often linked to family members or acquaintances who mistakenly believe someone has brought
2769 shame to their family or community by doing something that is not in keeping with the traditional beliefs

2770 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider
 2771 network of family or community pressure and can include multiple perpetrators. It is important to be
 2772 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to
 2773 take” for example, honour-based violence might be committed against individuals who:

- 2774 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2775 • want to get out of an arranged marriage
- 2776 • want to get out of a forced marriage
- 2777 • wear clothes or take part in activities that might not be considered traditional within a particular
 2778 culture.

2779 9.106. Girls and women are the most common victims of honour-based violence however; it can also affect
 2780 men and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of
 2781 ‘honour’ might include: domestic abuse, threats of violence, assault, sexual or psychological abuse,
 2782 forced marriage, being held against their will or taken somewhere they don’t want to go.

2783 9.107. If staff believe that the Individual is at risk from honour-based violence, the DSL will follow the usual
 2784 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual
 2785 is at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
 2786 teachers. It is important that if honour-based violence is known or suspected, communities and family
 2787 members must NOT be contacted prior to referral to the police or social care as this could increase the
 2788 risk to the individual.

2789 **Preventing extremism and radicalisation**

2790 9.108. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism
 2791 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**
 2792 **Extremism and Radicalisation policy** and **0.27 E-safety policy**, we all need to be vigilant in ensuring the
 2793 safety from extremist and terrorist material when accessing the internet. We consider
 2794 Northamptonshire Local Authority Safeguarding Children’s Board arrangements to fulfil its Prevent
 2795 duties.

2796 9.109. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from
 2797 other forms of harms and abuse, protecting children from this risk should be a part of a schools or
 2798 colleges’ safeguarding approach.

- 2799 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy,
 2800 the rule of law, individual liberty and the mutual respect and tolerance of different faiths and
 2801 beliefs. This also includes calling for the death of members of the armed forces.

- 2802 • **Radicalisation** refers to the process by which a person comes to support terrorism and
 2803 extremist ideologies associated with terrorist groups.

- 2804 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes
 2805 serious damage to property; or seriously interferes or disrupts an electronic system. The use
 2806 or threat **must** be designed to influence the government or to intimidate the public and is
 2807 made for the purpose of advancing a political, religious or ideological cause.

2808 9.110. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
 2809 Background factors combined with specific influences such as family and friends may contribute to a
 2810 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social
 2811 media or the internet) and settings (such as within the home).

2812 9.111. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
 2813 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert
 2814 to changes in children’s behaviour, which could indicate that they may be in need of help or protection.

2815 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2816 proportionately which may include making a Prevent referral.

2817 9.112. The school's or college's DSL (and any deputies) should be aware of local procedures for making a
2818 Prevent referral

2819 9.113. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security
2820 Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent
2821 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2822 9.114. [An online general awareness-training module on Channel is available](#). The module is suitable for
2823 school staff and other front-line workers. It introduces the topics covered by this advice, including how
2824 to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the
2825 types of intervention that may be appropriate, in addition to Channel.

2826 Prevent Duty

2827 9.115. The Prevent duty should be seen as part of schools and colleges' wider safeguarding obligations. DSLs
2828 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty
2829 guidance for England & Wales](#), especially paragraphs 57-76, which are specifically concerned with
2830 schools (and also covers childcare). DSLs and other senior leaders in colleges should familiar
2831 themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The
2832 guidance is set out in terms of four general themes: risk assessment, working in partnership, staff
2833 training, and IT policies.

2834 9.116. Local authorities will be expected to ensure appropriate frontline staff, including those of its contractors,
2835 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into
2836 terrorism and are aware of available programmes to deal with this issue.

2837 9.117. As the independent body responsible for standards and quality improvement for further education, the
2838 Education and Training Foundation will work with the sector to ensure that appropriate training is
2839 available. This will include and draw from training provided through the network of Prevent co-
2840 ordinators.

2841 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

2842 9.118. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2843 9.119. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an
2844 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal
2845 activity, in exchange for something the victim needs or wants, and/or for the financial advantage or
2846 increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE
2847 and CCE can affect children, both male and female and can include children who have been moved
2848 (commonly referred to as trafficking) for the purpose of exploitation.

2849 Child Criminal Exploitation (CCE)

2850 9.120. Some specific forms of CCE can include children being forced or manipulated into transporting drugs
2851 or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can
2852 also be forced or manipulated into committing vehicle crime or threatening/committing serious
2853 violence to others. Children can become trapped by this type of exploitation as perpetrators can
2854 threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be
2855 coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from
2856 harm from others. As children involved in criminal exploitation often commit crimes themselves, their
2857 vulnerability as victims is not always recognised by adults and professionals, (particularly older
2858 children), and they are not treated as victims despite the harm they have experienced. They may still
2859 have been criminally exploited even if the activity appears to be something they have agreed or
2860 consented to.

2861 9.121. It is important to note that the experience of girls who are criminally exploited can be very different to
2862 that of boys. The indicators may not be the same; however, professionals should be aware that girls

2863 are at risk of criminal exploitation too. It is also important to note that both boys and girls being
2864 criminally exploited may be at higher risk of sexual exploitation.

2865 **Child Sexual Exploitation (CSE)**

2866 9.122. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by
2867 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing,
2868 rubbing, and touching outside clothing. It may include noncontact activities, such as involving children
2869 in the production of sexual images, forcing children to look at sexual images or watch sexual activities,
2870 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for
2871 abuse including via the internet.

2872 9.123. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate
2873 knowledge e.g. through others sharing videos or images of them on social media.

2874 9.124. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and
2875 17 year olds who can legally consent to have sex. Some children may not realise they are being
2876 exploited e.g. they believe they are in a genuine romantic relationship.

2877 9.125. Children with learning difficulties can be particularly vulnerable to exploitation as can children from
2878 particular groups, e.g. looked after children, young carers, children who have a history of physical,
2879 sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol,
2880 children who go missing from home or school, children involved in crime, children with parents/carers
2881 who have mental health problems, learning difficulties/other issues, children who associate with other
2882 children involved in exploitation. However, it is important to recognise that any child can be targeted.

2883 9.126. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors
2884 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or
2885 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants
2886 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator
2887 or facilitator.

2888 9.127. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age
2889 of 18 years, including 16- and 17-year olds who can legally consent to have sex) or adults. It is critical
2890 to know that children/young people may also be exploited by other children/young people, who
2891 themselves may be experiencing exploitation – where this is the case, it is important that the
2892 child/young person perpetrator is also recognised as a victim.

2893 9.128. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic
2894 to complex organised abuse. It can involve force and/or enticement-based methods of compliance
2895 and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even
2896 when activity appears consensual and it should be noted exploitation as well as being physical can be
2897 facilitated and/or take place online. More information include definitions and indicators are included

2898 in [KCSIE 2023](#)- Some of the following can be indicators of both child criminal and sexual exploitation
2899 where children:

- 2900 • appear with unexplained gifts or new professions;
- 2901 • associate with other young people involved in exploitation;
- 2902 • suffer from changes in emotional well-being;
- 2903 • misuse drugs and alcohol;
- 2904 • go missing for periods of time or regularly or come home late; and
- 2905 • regularly miss school or education or do not take part in education.

2906 9.129. Some additional specific indicators that may be present in CSE and children who:

- 2907 • Children who have older boyfriends or girlfriends; and
- 2908 • Children who suffer from sexually transmitted infections, display sexual behaviours
2909 beyond expected sexual development or become pregnant.

2910 9.130. Further information on signs of a child's involvement in sexual exploitation is available in Home Office
2911 guidance: Child sexual exploitation: guide for practitioners.

2912 9.131. As an organisation we do recognise that the same level of exploitation may take place involving
2913 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged
2914 18 years or over and at risk of abuse or neglect because of their needs for care and/or support (The
2915 Care Act 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is
2916 expected that the above statement will equally apply to those who are 18+ across England and Wales.

2917 9.132. Children under the age of criminal responsibility (under the age of 10), or young people who have
2918 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into
2919 criminal activity provide opportunity for criminals to distance themselves from crime.

2920 County Lines

2921 9.133. County lines is a term used to describe gangs and organised criminal networks involved in exporting
2922 illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen
2923 locally as well as across the UK - no specified distance of travel is required. Children and vulnerable
2924 adults are exploited to move, store and sell drugs and money. Offenders will often use coercion,
2925 intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
2926 Children can be targeted and recruited. Exploitation is an integral part of the county lines, children may
2927 become victims through: coercion, intimidation, violence (including sexual) and weapons.

2928 9.134. Children can be targeted and recruited into county lines in a number of locations including schools,
2929 further and higher educational institutions, pupil referral units, special educational needs schools,
2930 children's homes and care homes. Children are often recruited to move drugs and money between
2931 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed
2932 internally to avoid detection. Children can easily become trapped by this type of exploitation as county
2933 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their
2934 families) if they attempt to leave the county lines network.

2935 9.135. Children are also increasingly being targeted and recruited online using social media. Children can
2936 easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts
2937 which need to be worked off or threaten serious violence and kidnap towards victims (and their
2938 families) if they attempt to leave the county lines network. These children and young people are at
2939 serious risk of criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group

- 2940 who may not necessarily be affiliated to a gang, but who have developed networks across
2941 geographical boundaries to access and exploit existing drugs markets in these areas.
- 2942 9.136. The group, or individuals exploited by them, travel regularly between the urban hub and the rural
2943 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug
2944 supply but is generally more frequent and in smaller deal amounts compared to most other drug
2945 supply methods.
- 2946 9.137. A number of the indicators for CSE and CCE as detailed above may be applicable to where children
2947 are involved in county lines. Some additional specific indicators that may be present where a child is
2948 criminally exploited through involvement in county lines are children who:
- 2949 • go missing and are subsequently found in areas away from their home;
 - 2950 • have been the victim or perpetrator of serious violence (e.g. knife crime);
 - 2951 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and
2952 collecting money for drugs;
 - 2953 • are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid
2954 detection;
 - 2955 • are found in accommodation that they have no connection with, often called a ‘trap house or
2956 cuckooing’ or hotel room where there is drug activity;
 - 2957 • owe a ‘debt bond’ to their exploiters;
 - 2958 • have their bank accounts used to facilitate drug dealing.
- 2959 9.138. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be
2960 considered alongside consideration of availability of local services/third sector providers who offer
2961 support to victims of county lines exploitation.
- 2962 9.139. Further information on the signs of a child’s involvement in county lines is available in guidance
2963 published by the [Home Office and The Children’s Society County Lines Toolkit for Professional](#).
- 2964 **Cuckooing**
- 2965 9.140. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation
2966 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to
2967 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to
2968 as cuckooing.
- 2969 9.141. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order
2970 to use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common

2971 problem in the South of England. The crime is named for the cuckoo's practice of taking over other
2972 birds' nests for its young.

2973 9.142. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and
2974 firearms.

2975 9.143. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally
2976 exploited include:

2977 ▪ Increase in missing episodes (Education and/or Care) – particular key as
2978 children/young people can be missing for days and drug run in other counties

2979 ▪ Having unexplained amounts of money, new high cost items and multiple mobile
2980 phones

2981 ▪ Increased social media and phone/text use, almost always secretly

2982 ▪ Older males in particular seen to be hanging around and driving

2983 ▪ Having injuries that are unexplained and unwilling to be looked at

2984 ▪ Increase in aggression, violence and fighting

2985 ▪ Carrying weapons – knives, baseball bats, hammers, acid

2986 ▪ Travel receipts that are unexplained

2987 ▪ Significant missing cases from education and disengaging from previous positive
2988 peer groups

2989 ▪ Parents/carers concerns and significant changes in behaviour that affect emotional
2990 wellbeing

2991 9.144. We will treat any child/young person who may be criminally exploited as a victim in the first instance
2992 and refer to the Local Safeguarding Authority in the first instance. If a referral to the police is also
2993 required as crimes have been committed on the school premises, these will also be made.

2994 **Knife crime**

2995 9.145. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes
2996 references to both; to the use of knives against children either to threaten or to wound them and to
2997 instances when children may have been carrying or using knives for a range of purposes.

2998 9.146. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults
2999 and knife-carrying. However, there are many different criminal offences relating to knives. For example:

3000 • it is an offence to threaten or cause harm to a person with a bladed weapon

3001 • some bladed weapons are prohibited from being sold or purchased, including to anyone
3002 under the age of 18

3003 • offences such as robbery or assault can be aggravated if a knife is involved

3004 • it is also an offence to carry a knife in a public place without good reason.

3005 • It is clear that knife crime is an increasing safeguarding risk to children and young people,
3006 both at school and in their local communities. While Ofsted have not sought to answer

3007 the question of the causes of knife crime, leaders told Ofsted that, in their experience,
3008 children are in three categories of risk of knife carrying.

3009 9.147. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
3010 criminal exploitation.

3011 9.148. Underneath this lies a group of children who have witnessed other children carrying knives, have been
3012 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition
3013 or who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and
3014 knives on social media.

3015 9.149. Then there are children who carry knives to school as an isolated incident. For example, they may carry
3016 a penknife that a grandparent has gifted them

3017 9.150. It is important to remember that knife crime does not exist in a vacuum and children who are victims
3018 or perpetrators may also be experiencing multiple vulnerabilities.

3019 9.151. Some children and young people can be more at risk of being drawn into criminality; multiple studies
3020 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
3021 both understand and address individual risk factors as well as address the social challenges that
3022 underpin criminal exploitation and serious violence in our communities, from poor mental health,
3023 addiction, poverty, unemployment and poor-quality housing.

3024 **Missing young people and the link between missing and county lines**

3025 9.152. Every precaution is taken through the use of risk assessments and thorough planning and supervision
3026 to ensure that children, young people and young adults are safe both at school, college, home, and
3027 on outings. If a child, young person or young adult goes missing from our Location, it is considered a
3028 potential indicator of abuse or neglect.

3029 9.153. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of
3030 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to
3031 attend school regularly or has been absent without the school's permission for a continuous period of
3032 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are
3033 alert to signs such as travelling to conflict zones, FGM and forced marriage.

3034 9.154. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
3035 towards going missing and becoming involved in criminal activities. Some individuals may be pulled
3036 towards exploitation through the promise of money, gifts, affection and status. However, they may be
3037 then be forced to work for these people as they are coerced into believing that they are indebted to
3038 them.

3039 **Domestic abuse**

3040 9.155. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever
3041 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as
3042 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of
3043 domestic abuse, based on the previous cross-government definition, ensures that different types of
3044 relationships are captured, including ex-partners and family members. The definition captures a range
3045 of different abusive behaviours, including physical, emotional and economic abuse and coercive and
3046 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the
3047 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as
3048 defined in section 2 of the 2021 Act).

3049 9.156. Types of domestic abuse include intimate partner violence, abuse by family members, teenage
3050 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of
3051 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background
3052 and domestic abuse can take place inside or outside of the home.

3053 9.157. All children can witness and be adversely affected by domestic abuse in the context of their home life
3054 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence

- 3055 can have a serious, long lasting emotional and psychological impact on children. In some cases, a
3056 child may blame themselves for the abuse or may have had to leave the family home as a result.
- 3057 9.158. Young people can also experience domestic abuse within their own intimate relationships. This form
3058 of abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young
3059 people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or
3060 both parties are under 16). However, as with any child under 18, where there are concerns about safety
3061 or welfare, child safeguarding procedures should be followed and both young victims and young
3062 perpetrators should be offered support.
- 3063 9.159. KCSIE2023 introduces additional information about domestic abuse which can encompass a wide
3064 range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is
3065 not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of
3066 domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer
3067 domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have
3068 a detrimental and long-term impact on their health, well-being, development, and ability to learn.
- 3069 9.160. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work
3070 together to provide emotional and practical help to children. The system ensures that when police are
3071 called to an incident of domestic abuse, where there are children in the household who have
3072 experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before
3073 the child or children arrive at school the following day. This ensures that the school has up to date
3074 relevant information about the child's circumstances and can enable immediate support to be put in
3075 place, according to the child's needs. Operation Encompass does not replace statutory safeguarding
3076 procedures. Where appropriate, the police and/or schools should make a referral to children's social
3077 care if they are concerned about a child's welfare. More information about the scheme and how
3078 schools can become involved is available on the Operation Encompass website.
- 3079 9.161. Operation Encompass provides an advice and helpline service for all staff members from educational
3080 settings who may be concerned about children who have experienced domestic abuse. The helpline
3081 is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).
- 3082 9.162. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in
3083 confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential
3084 victims, as well as those who are worried about friends and loved ones. It also has a form through

3085 which a safe time from the team for a call can be booked. Additional advice on identifying children
3086 who are affected by domestic abuse and how they can be helped is available at:

- 3087 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 3088 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 3089 • [Safelives: young people and domestic abuse.](#)
- 3090 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes
3091 information for adult victims, young people facing abuse in their own relationships and
3092 parents experiencing child to parent violence/abuse)
- 3093 • Home : [Operation Encompass](#) (includes information for schools on the impact of
3094 domestic abuse on children)

3095 **Serious Violent Crime**

3096 9.163. All staff should be aware of indicators, which may signal that children are at risk from, or are involved
3097 with serious violent crime. These may include:

- 3098 • increased absence from school with a significant decline in performance,
- 3099 • a change in friendships or relationships with older individuals or group,
- 3100 • signs of self-harm or a significant change in well-being, or signs of assault or
3101 unexplained injuries,
- 3102 • unexplained gifts or new possessions could also indicate that children have been
3103 approached by, or are involved with individuals associated with criminal networks
3104 or gangs.

3105 9.164. All staff should be aware of the associated risks and understand the measures in place to measure
3106 these. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and
3107 gang involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance](#)
3108 [- September 2018.](#)

3109 **Mental Health**

3110 9.165. Schools, colleges and homes have an important role to play in supporting the mental health and
3111 wellbeing of young people. All staff should be aware that mental health problems can, in some cases,
3112 be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

3113 9.166. Schools/colleges and homes need to ensure they have clear systems and processes in place for
3114 identifying possible mental health problems, including routes to escalate and clear referral and
3115 accountability systems.

3116 9.167. The Department is providing funding to support costs of a significant training program for senior mental
3117 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will
3118 be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole
3119 school or college approach to mental health.

3120 9.168. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health
3121 problem. Staff however, are well placed to observe children day-to-day and identify those whose
3122 behaviour suggests that they may be experiencing a mental health problem or be at risk of developing
3123 one. If staff suspect this might be the case they should report their concerns to a senior leader within
3124 the school and if possible bring their concerns to a member of the clinical team.

3125 9.169. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood
3126 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It

3127 is key that staff receive appropriate education and training so that they are aware of how these
3128 children’s experiences, can impact on their mental health, behaviour and education.

3129 9.170. If staff have a mental health concern about a child that is also a safeguarding concern, immediate
3130 action should be taken. Staff should follow their child protection policy and speak immediately to the
3131 DSL or a deputy.

3132 9.171. Schools and colleges can access a range of advice to help them identify children in need of extra
3133 mental health support; this includes working with external agencies. More information can be found
3134 in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance
3135 as best practice. Public Health England has produced a range of resources to support secondary school
3136 teachers to promote positive health, wellbeing and resilience among children.

3137 9.172. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be
3138 useful for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out
3139 how schools and colleges can help prevent mental health problems by promoting resilience as part of
3140 an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to
3141 the needs of their pupils.

3142 9.173. In addition, Public Health England has produced a range of resources to support secondary schools to
3143 promote positive health, wellbeing and resilience among children including its guidance Promoting
3144 children and young people’s emotional health and wellbeing. Its resources include social media,
3145 forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson
3146 plans. The Department has also published, [‘Every interaction matters’](#), a pre-recorded webinar which
3147 provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits
3148 alongside our [Wellbeing for education recovery program](#) content, which covers issues such as
3149 bereavement, loss, anxiety, stress and trauma.

Human trafficking

3151 9.174. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a
3152 process that is a combination of:

- 3153 - Movement (including within the UK);
- 3154 - Control, through harm / threat of harm or fraud
- 3155 - For the purpose of exploitation

3156 9.175. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming
3157 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a
3158 life of abuse, servitude and inhumane treatment.

3159 9.176. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is
3160 significant evidence that children/young people/young adults (both of UK and other citizenship) are

- 3161 being trafficked internally within the UK and this is regarded as a more common form of trafficking in
3162 the UK.
- 3163 9.177. There are a number of indicators which suggest that a child/young person/young adult may have
3164 been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are
3165 as follows:
- 3166 - Shows signs of physical or sexual abuse, and/or has contracted a sexually
3167 transmitted infection or has an unwanted pregnancy
 - 3168 - Has a history with missing links and unexplained moves
 - 3169 - Is required to earn a minimum amount of money every day
 - 3170 - Works in various locations
 - 3171 - Has limited freedom of movement
 - 3172 - Appears to be missing for periods
 - 3173 - Is known to beg for money
 - 3174 - Is being cared for by adult/s who are not their parents and the quality of the
3175 relationship between the child and their adult carers is not good
 - 3176 - Is one among a number of unrelated children found at one address
 - 3177 - Has not been registered with or attended a GP practice
 - 3178 - Is excessively afraid of being deported.
- 3179 9.178. For those children/young people/young adults who are internally trafficked within the UK indicators
3180 include:
- 3181 - Physical symptoms (bruising indicating either physical or sexual assault)
 - 3182 - Prevalence of a sexually transmitted infection or unwanted pregnancy
 - 3183 - Reports from reliable sources suggesting the likelihood of involvement in
 - 3184 - Sexual exploitation / the child has been seen in places known to be used for sexual
3185 exploitation
 - 3186 - Evidence of drug, alcohol or substance misuse
 - 3187 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or
3188 borrowing clothing from older people
 - 3189 - Relationship with a significantly older partner
 - 3190 - Accounts of social activities, expensive clothes, mobile phones or other possessions
3191 with no plausible explanation of the source of necessary funding
 - 3192 - Persistently missing, staying out overnight or returning late with no plausible
3193 explanation
 - 3194 - Returning after having been missing, looking well cared for despite having not been
3195 at home
 - 3196 - Having keys to premises other than those known about

- 3197 - Low self- image, low self-esteem, self-harming behaviour including cutting,
3198 overdosing, eating disorder, promiscuity
- 3199 - Truancy / disengagement with education
- 3200 - Entering or leaving vehicles driven by unknown adults
- 3201 - Going missing and being found in areas where the child/young person/young adult
3202 has no known links; and/or
- 3203 - Possible inappropriate use of the internet and forming on-line relationships,
3204 particularly with adults/other adults.

3205 9.179. These behaviours themselves do not indicate that an Individual is being trafficked, but should be
3206 considered as indicators that this may be the case.

3207 **Child abduction and community safety incidents**

3208 9.180. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal
3209 responsibility for the child. Child abduction can be committed by parents or other family members; by
3210 people known but not related to the victim (such as neighbours, friends and acquaintances); and by
3211 strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst
3212 children and parents, for example, people loitering nearby or unknown adults engaging children in
3213 conversation.

3214 9.181. As children get older and are granted more independence (for example, as they start walking to school
3215 on their own), it is important they are given practical advice on how to keep themselves safe. Many
3216 schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that
3217 lessons focus on building children's confidence and abilities rather than simply warning them about all
3218 strangers. Further information is available at: <http://www.actionagainstabduction.org/> and
3219 <https://clevernevergoes.org/>

3220 **Modern slavery and the National Referral Mechanism**

3221 9.182. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory
3222 labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery,
3223 servitude, forced criminality and the removal of organs.

3224 9.183. When considering modern slavery, there is a perception that this is taking place overseas. The
3225 government estimates that tens of thousands of slaves are in the UK today.

3226 9.184. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,
3227 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from
3228 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also
3229 been rescued within the UK.

3230 9.185. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be
3231 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

3232 9.186. Further information on the signs that someone may be a victim of modern slavery, the support available
3233 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
3234 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

3235 **Cybercrime**

3236 9.187. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised
3237 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-

3238 line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent
3239 crimes include:

3240 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's
3241 computer network to look for test paper answers or change grades awarded;

3242 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,
3243 network or website unavailable by overwhelming it with internet traffic from multiple sources;
3244 and

3245 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,
3246 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,
3247 including those above.

3248 9.188. Children with particular skill and interest in computing and technology may inadvertently or deliberately
3249 stray into cyber-dependent crime.

3250 9.189. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the
3251 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and
3252 led by the National Crime Agency, working with regional and local policing. It aims to intervene where
3253 young people are at risk of committing, or being drawn into, low level cyber-dependent offences and
3254 divert them to a more positive use of their skills and interests.

3255 9.190. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of
3256 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-
3257 line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When](#)
3258 [to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

3259 **Initiation/Hazing**

3260 9.191. Hazing is a form of initiation ceremony, which is used to induct newcomers into an organisation such
3261 as a private school, sports team etc. There are a number of different forms, from relatively mild rituals
3262 to severe and sometimes violent ceremonies in gangs/criminal groups.

3263 9.192. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials,
3264 which promote a bond between them. After the hazing is over, the newcomers also have something
3265 in common with older members of the organisation, because they all experienced it as part of a rite of
3266 passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

3267 9.193. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour
3268 and raise awareness of such within all services.
3269

3270 **Safeguarding issues relating to Individual children and young people needs**

3271 **Homelessness**

3272 9.194. As an organisation we recognise that being homeless or being at risk of becoming homeless presents
3273 a real risk to a child's/young person welfare. The impact of losing a place of safety and security can
3274 affect an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress
3275 concerns at the earliest opportunity.

3276 9.195. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing
3277 Authority for the parent/guardians in order to raise/progress concerns.

3278 9.196. In most cases school and college, colleagues will be considering homelessness in the context of
3279 children who live with their families, and intervention will be on that basis. However, it should also be
3280 recognised in some cases 16 and 17 year olds could be living independently from their parents or
3281 guardians, for example through their exclusion from the family home, or other reasons. This will require
3282 a different level of intervention and support. Children's services will be the lead agency for these young
3283 people and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's

3284 circumstances. The department and the Ministry of Housing, Communities and Local Government have
 3285 published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may
 3286 be homeless and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3287 9.197. Guidance on how local authorities should exercise their homelessness functions in accordance with
 3288 the Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local](#)
 3289 [authorities](#).

3290 9.198. Children’s services (Adult’s services where the person is 18 +) will be the lead agency for these young
 3291 people and the DSL should ensure appropriate referrals are made based on the Individual’s
 3292 circumstances.

3293 9.199. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be
 3294 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding
 3295 Authority where an Individual has been harmed or is at risk of harm.

3296 **Private Fostering**

3297 9.200. Private fostering is an arrangement by a child’s parents for their child (under 16 or 18 if disabled) to be
 3298 cared for by another adult who is not closely related and is not a legal guardian with parental
 3299 responsibility for 28 days or more.

3300 9.201. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,
 3301 uncle or aunt.

3302 9.202. The Law requires that the carers and parents must notify the Children’s Services Department of any
 3303 private fostering arrangement.

3304 9.203. If the school/college/children’s home/care homes (16-18) becomes aware that a child/young person
 3305 is being privately fostered they will inform the Children’s Services Department and inform both the
 3306 parents and carers that they have done so.

3307 **Child and the Court System**

3308 9.204. As an organisation we recognise that children/young people are sometimes required to give evidence
 3309 in criminal courts, either for crimes committed against them or for crimes, they have witnessed. We
 3310 know that this can be a stressful experience and therefore services across the organisation will aim to
 3311 support children through this process.

3312 9.205. Along with information, advice and guidance, services will use age-appropriate materials published
 3313 by HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it
 3314 means to be a witness, how to give evidence and the special measures which are in place to assist
 3315 such as using a live link/aids to communicate and video links.

3316 9.206. We recognise that making child arrangements via the family courts following separation can be
 3317 stressful and entrench conflict in families. This can be very stressful for children. Services will support
 3318 children/young people going through this process.

3319 9.207. Alongside information, advice and guidance services will use online materials published by The
 3320 Ministry of Justice (2018) which offers children/young people information & advice on the dispute

3321 resolution service - [Get help with child arrangements](#). These materials will also be offered to parents
3322 and carers if appropriate.

3323 9.208. Ensure that children/young people are sufficiently supported where a parent has been sent to prison;
3324 adequate support includes protection from stigma, isolation and poor mental health.

3325 **Fabricated or induced illnesses (FI)**

3326 9.209. Fabricated or induced illness (FI) is a rare form of child abuse. It occurs when a parent or carer, usually
3327 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3328 9.210. FI is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's
3329 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3330 9.211. FI covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child.
3331 This ranges from extreme neglect (failing to seek medical care) to induced illness.

3332 9.212. Behaviours in FI include a parent/carer who:

- 3333
- persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3334
- exaggerates or lies about their child's symptoms,
- 3335
- manipulates test results to suggest the presence of illness – for example, by putting glucose in
3336 urine samples to suggest the child has diabetes,
- 3337
- deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
3338 medication or other substances.
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