

1 Policy and Procedure on

2 Child Protection and Safeguarding – children’s

3 services

4 Bletchley Park School

5

Policy Author	Compliance & Quality Team
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19 **1. Monitoring and review**20 1.1 The Cambian (the Proprietor) will undertake a formal annual review of this policy for the purpose of
21 monitoring and of the efficiency with which the related duties have been discharged, or if significant

22 changes to the systems and arrangements take place, or if legislation, regulatory requirements or best
23 practice guidelines so require.

24 1.2 The local content of this policy will be subject to continuous monitoring, refinement and audit by the Head
25 of Service.

26 Signed:
27



Jeremy Wiles
Group Executive Director- Children’s Services

Date: August 2023



Laura Sharman

Headteacher
September 2023

28

29 **2. Terminology**

30 2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as
31 follows:
32

‘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 Bletchley Park School we have young people attending our school between the ages of 7 and 19 years.
Head of Service	This is the senior person with overall responsibility for the school. At Bletchley Park School this is the Headteacher, Laura Sharman.
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
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.
CambianKPI	The online in-house information system, which holds data for each site on quality measures.

34 3. Definitions and age-related arrangements

- 35 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies
36 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2023)
37 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)
38 Act 2021.
- 39 3.2. **Adults are over the age of 18.** Over 18-year olds are covered by the Local Safeguarding Adult Boards
40 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse
41 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and
42 as a result of their particular care and support needs, is unable to protect themselves from either the risk
43 of, or the experience of abuse or neglect'. We refer to adult service users in our provision as **young adults**
44 due to the fact we provide children's services up to the age of 25.
- 45 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the
46 legal framework for social service provision in Wales. It sets out what must and should be done to
47 safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and
48 ensure the effectiveness of work to protect and promote the welfare of children.
- 49 3.4. Staff working with young adults aged 18 and over, who receive education, care and support from our
50 children's services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional
51 Safeguarding Children's Boards depending on local arrangements.
- 52 3.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who
53 attend a day or residential school or college – this might be 38- or 52-weeks' provision. Some children
54 attending school or college live in children's homes or care homes across England and Wales, hence the
55 reason why this policy and procedure is more comprehensive than that of a traditional day school or
56 college. Our safeguarding responsibility extends beyond day education and often covers 24hrs services
57 regulated by various regulators across the UK.
- 58 3.6. Where we make references to schools and colleges, this also includes associated children's or care homes
59 in which children/young people live. Where we make references to children's or care homes, those cover
60 all children's/care homes including those within the children's residential care division.

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

- 62 3.7. Children's Social Care - provide support to children in need of help and protection, including children with
63 disabilities. Services include statutory assessment and care planning for children at risk of significant
64 harm, provision for cared for children and care experienced young people, as well as fostering and
65 adoption services.
- 66 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governance
67 boards and proprietor should ensure that the school or college contributes to multi-agency working in
68 line with statutory guidance [Working Together to Safeguard Children](#).
- 69 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area
70 within the local authority and the chief officer of police for an area (any part of which falls)) within the
71 local authority work together with appropriate relevant agencies to safeguard and promote the welfare
72 of local children, including identifying and responding to their needs.
- 73 3.10. It is especially important that schools and colleges understand their role in the three safeguarding partner
74 arrangements. Governance boards, proprietor and their senior leadership teams, especially their DSLs,
75 should make themselves aware of and follow their local arrangements.
- 76 3.11. The three safeguarding partners should allow all schools and colleges in the local area to be fully engaged,
77 involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding

78 partners will name schools and colleges as relevant agencies and will reach their own conclusions on the
79 best way to achieve the active engagement with individual institutions in a meaningful way.

Child protection definition

81 3.12. Child protection is part of the safeguarding process. It focuses on protecting individual children identified
82 as suffering or likely to suffer significant harm. This includes child protection procedures, which detail
83 how to respond to concerns about a child.

Safeguarding definition – Working together to safeguard children 2018

85 3.13. **Safeguarding children and young people** is the action taken to promote the welfare of children and
86 protect them from harm. It means:

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

Safeguarding definition – Keeping Children Safe in Education 2023

92 3.14. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes
93 into contact with children and their families has a role to play. In order to fulfil this responsibility
94 effectively, all practitioners should make sure their approach is child-centred. This means that they should
95 consider, at all times, what is in the best interests of the child.

96 3.15. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 97 • Protecting children from maltreatment,
- 98 • Preventing impairment of children’s mental and physical health or development,
- 99 • Ensuring that children grow up in circumstances consistent with the provision of safe
100 and effective care, and
- 101 • Acting to enable all children to have the best outcomes.

Safeguarding Adults

103 3.16. Safeguarding adults means protecting an adult’s right to live in safety, free from abuse and neglect.
104 It is about people and organisations working together to prevent and stop both the risks and experience of abuse
105 or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where
106 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

107 3.17. The statutory guidance enshrines the **six principles** of adults safeguarding:

- 108
- 109 • Empowerment - presumption of person led decisions and informed consent
- 110 • Prevention - it is better to act before harm occurs
- 111 • Proportionality - proportionate and least intrusive response appropriate to the risk
112 presented
- 113 • Protection - support and representation for those in greatest need
- 114 • Partnerships - local solutions through services working with their communities
- 115 • Accountability - accountability and transparency in delivering safeguarding

116 3.18. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and
117 procedures, which apply to its Adults’ Services. Both policies can be accessed via Rezume. Services

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

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

121 3.19. In relation to children's services - in practice safeguarding is the policies and practices that
122 schools/colleges/children's homes employ to keep children safe and promote their well-being. This
123 means everything from security of the buildings, to the safe recruitment of staff and everything in
124 between. **Appendix 10.** illustrates safeguarding in children's services.

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

126 3.20. In the context of a child/young person, abuse and neglect are forms of maltreatment. Somebody may
127 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.
128 Children/young people may be abused in a family or in an institutional or community setting, by those
129 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another
130 child/young person or children/young people.

131 3.21. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of these.
132 The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse - children.** The
133 signs that someone could be a victim or an abuser have been explored in **Appendix 6** and **Appendix 7.**
134 Parents, carers and other people can harm children and young people by direct acts and/or failure to
135 provide proper care. It should also be understood that children can also be abused by being sexually
136 exploited, or subject to honour-based abuse, domestic violence, forced marriage, female genital
137 mutilation and through online social media. See **Appendix 12 - Further safeguarding information – what
138 everyone needs to know.**

139 3.22. In the context of an adult, abuse is a violation of a person's human and civil rights by another person or
140 persons and may result in significant harm to, or the exploitation of, the person subjected to it.

141 3.23. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children,** there are other
142 forms of abuse in relation to adults explained in more detail in **Appendix 5 – Types of abuse – Adults.**

143 3.24. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a
144 care home, school or in a college. It can happen when someone lives alone or with others. Anyone can
145 carry out abuse or neglect. Abuse can be intentional or unintentional; it may be a single act or repeated
146 acts.

147 **4. Purpose**

148 4.1. As an organisation, we have a clear set of guidelines to make sure we deal with child protection and
149 safeguarding concerns effectively.

150 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance,** and it complies
151 with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information
152 Poster.** This policy complies with MKSCB, NSCB, Bucks LSCB, HSCP, Central Beds LSCB, Bedfordshire LSCB,
153 Luton SCB and Oxford SCB's locally agreed procedures. Printed or electronic copies of the Local

- 154 Safeguarding Children’s Partnerships (LSCP), Local Safeguarding Adults Board (LSAB) are available in every
155 setting.
- 156 4.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with
157 the requirements of the local authority in which the establishment is situated.
- 158 4.4. This policy, and supporting information in various accessible forms, is made available to all individuals,
159 staff and parents associated with Cambian Bletchley Park School to ensure that everyone is clear on
160 procedures for ensuring the protection of children and safeguarding children and young adults.
- 161 4.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11.
162 Staff Code of Practice and GHR 37. Code of Conduct.**
- 163 4.6. In addition, staff should be aware of and have access to the **NSPCC whistle-blowing helpline number
164 0800 028 0285** and the Cambian Whistleblowing service operated by **EthicsPoint on 0800 086 9128**. More
165 information about EthicsPoint and how it can be contacted can be found in the Whistleblowing policy.
- 166 4.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to support
167 school and college staff with when it is appropriate to contact the police.
- 168 4.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer
169 from harm, it is important that a referral to children’s social care (and if appropriate the police) is made
170 immediately. Referrals should follow the local referral process.

171 5. Policy

172 Safeguarding culture of the organisation

- 173 5.1. Cambian safeguarding culture can be best described as:
- 174 - **Proactive**, being professionally curious to determine further information in the interests of the
175 child. It is essential that staff exercise professional curiosity at all times, as it is likely that signs
176 of any form of abuse including neglect will be identified when dealing with an un-associated
177 incident. Having strong governance and leadership, raising awareness through and enhancing

- 178 children’s and young people’s capacity around the risks and their own safety, regular reflective
179 supervision).
- 180 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other
181 professionals in timely manner, active listening, applying theory in practice in a methodical
182 way).
- 183 - **Reflective** (understanding ‘how we got there in the first place’, completing a reflective account
184 of events, involving other key professionals in future planning, identifying actions and further
185 changes to be made).
- 186 5.2. Child protection and safeguarding is everyone’s responsibility. Everyone working for or visiting our
187 locations has a responsibility to understand and implement this policy and procedure at all times.
- 188 5.3. All individuals in our services have a right to feel safe, secure and be protected from harm.
- 189 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
190 individuals with special educational needs (SEN) and disabilities:
- 191 • Are more likely to be abused or neglected;
 - 192 • May display behaviour, mood and/or injury, which may relate to possible abuse and not just
193 their SEN or a particular disability.
 - 194 • Have a higher risk of peer group isolation.
 - 195 • Can be disproportionately impacted by things like bullying without outwardly showing any signs.
 - 196 • Experience communication barriers and difficulties in overcoming these barriers.
- 197 5.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.
198 We will ensure all staff have the skills, knowledge and understanding to help keep children and young
199 people safe.
- 200 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or
201 disclosure that may indicate an individual is at risk of harm, either in the school, college, and care home
202 or in the community, taking into account contextual safeguarding, see **Appendix 12 - Further**
203 **safeguarding information – what everyone need to know** which also contains information related to
204 safeguarding issues related to individual children and young people’s needs.
- 205 5.7. We have a duty to help individuals learn how to keep themselves safe and deepen their understanding
206 of safeguarding, through both formal curriculum and informal opportunities.
- 207 5.8. As an organisation, we acknowledge that working in partnership with other agencies protects individuals
208 and reduces risk and so we will engage in partnership, working throughout the child protection process
209 to safeguard children and will equally work through safeguarding adults’ procedures as directed by local
210 procedures.
- 211 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance
212 referred to in this document can be found in separate appendices at the end of this document.

213 Divisional Safeguarding Board

- 214 5.10. As an organisation Caretech children’s services operates three Divisional Safeguarding Boards: Education,
215 Residential Care and Fostering. The main purpose of each board is to ensure that all services across
216 all divisions discharge their responsibilities effectively for assuring safe and secure services for children
217 and young people, and manage all safeguarding risks appropriately within its own workforce, including

218 direct employees and also the contracted workforce (supply workers/agency/contractor and
219 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

220 What staff should read and be aware of

221 5.11. On the 1st September 2023 Keeping Children Safe in Education (2023) guidance replaced Keeping Children
222 Safe in Education 2022. It is essential that everybody working in a school or college understands their
223 safeguarding responsibilities. Staff who work directly with children read at least [Part one](#) of this guidance.
224 Governance Boards and proprietor (or those acting on their behalf) working with their senior leadership
225 teams and especially their designated safeguarding lead, should ensure that those staff who do not work
226 directly with children read either Part one or [Annex A](#) (a condensed version of Part one) of this guidance.

227 5.12. The guidance should be read alongside:

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

231 5.13. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how
232 the learning from KCSIE2023 will take place with their staff. School /college's SLT should ensure that staff
233 complete the KCSIE2023 knowledge check.

234 5.14. All staff should be aware of systems within their school or college, which support safeguarding, and these
235 should be explained to them as part of staff induction. This should include the:

- 236 - Child protection and safeguarding policy
- 237 - Behaviour Support policy
- 238 - Anti bullying policy
- 239 - Whistleblowing policy, Code of conduct and Code of Practice policy
- 240 - Missing from Care policy, local procedure for children missing from education
- 241 - Role of the DSL (including the identity of the DSL and any deputies)
- 242 - Have Access to policies and a copy of Part one of KCSIE2023
- 243 - All staff should be aware of their local early help process and understand their role in it, more
244 information can be found in [Working Together to Safeguard Children 2018](#)
245 [\(publishing.service.gov.uk\)](#).

246 5.15. All staff should be aware of the process for making referrals to children's social care and for statutory
247 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child
248 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might
249 be expected to play in such assessments.

250 5.16. Schools concerned about a child's/young person's welfare should refer their concern to local authority
251 children's social care where the school is located. If the child is placed at the school by a different LA then
252 the school will need to inform that LA as well. Where a child is suffering, or is likely to suffer from harm,
253 it is important that a referral to children's social care (and if appropriate the police) is made immediately.
254 Referrals should follow the local referral process. Children's homes/care homes should follow their
255 referral process as per their local procedure and contact Safeguarding Partner/Safeguarding Board as per
256 their local Safeguarding procedure.

257 5.17. All staff should know what to do if a child/young person/young adult tells them he/she is being abused,
258 exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate
259 level of confidentiality. This means only involving those who need to be involved, such as the DSL (or a
260 deputy) and children's social care. Staff should never promise a child that they would not tell anyone
261 about a report of any form of abuse, as this might ultimately not be in the best interests of the child.

262 5.18. All staff should be able to reassure victims that they are being taken seriously and that they will be
263 supported and kept safe. A victim should never be given the impression that they are creating a problem

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

266 5.19. It is important to explain that the law is in place to protect children and young people rather than
267 criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

268 5.20. All staff should be aware that children may not feel ready or know how to tell someone that they are
269 being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For
270 example, children may feel embarrassed, humiliated, or being threatened. This could be due to their
271 vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from
272 having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also
273 important that staff determine how best to build trusted relationships with children and young people
274 which facilitate communication.

275 5.21. Staff should **not** assume a colleague, or another professional will act and share information that might be
276 critical in keeping children safe. They should be mindful that early information sharing is vital for the
277 effective identification, assessment, and allocation of appropriate service provision, whether this is when
278 problems first emerge, or where a child is already known to local authority children's social care (such as
279 a child in need or a child with a protection plan).

280 Whole service approach to safeguarding

281 5.22. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or
282 college approach to safeguarding. This means ensuring safeguarding and child protection are at the
283 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,
284 processes and policies should operate with the best interests of the child at their heart.

285 5.23. Where there is a safeguarding concern, the child's wishes and feelings must be considered when
286 determining what action to take and what services to provide. Systems should be in place, and they
287 should be well promoted, easily understood and easily accessible for children to confidently report abuse,
288 knowing their concerns will be treated seriously, and knowing they can safely express their views and
289 give feedback.

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

291 5.24. Children with special educational needs or disabilities (SEND) or certain health conditions can face
292 additional safeguarding challenges. There might be some additional barriers when recognising abuse and
293 neglect in this group of children. These can include:

294 • assumptions that indicators of possible abuse such as behaviour, mood and injury relate to
295 the child's/young person's condition without further exploration;

296 • these children/young people being more prone to peer group isolation or bullying
297 (including prejudice-based bullying) than other children/young people;

298 • the potential for children/young people with SEND or certain medical conditions being
299 disproportionately impacted by behaviours such as bullying, without outwardly showing any
300 signs; and

301 • Communication barriers and difficulties in managing or reporting these challenges.

302 5.25. SEN division and other services where children have/may have SEND should consider extra pastoral
303 support and attention for these children, along with ensuring any appropriate support for communication
304 is in place. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and](#)
305 [Supporting Pupils at School with Medical Conditions](#).

306 Virtual school heads

307 5.26. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and
308 academies, the designated teacher should work with the virtual school head to discuss how funding can
309 be best used to support the progress of looked after children in the school and meet the needs identified
310 in the child's personal education plan. The designated teacher should also work with the virtual school

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

315 6. Procedure

316 Roles and responsibilities

317 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**
 318 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and
 319 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

320 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors,
 321 partner organisations and visitors are aware of the policy and are supported to implement and work in
 322 accordance with it, as well as creating a management culture that encourages a focus on safeguarding.
 323 They must ensure that they are responsive, acting immediately if they become aware of any safeguarding
 324 concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

325 6.3. The **Designated Safeguarding Lead (DSL)** is responsible for handling reports and/or concerns, about the
 326 protection of children, young people and adults, appropriately and in accordance with the procedures
 327 that underpin this policy.
 328
 329



330

331 6.4. **Our DSL** is Stephen Doughty who is a senior member of our leadership team. The role of the DSL is to:

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

- 343 and welfare (including online and digital safety) and when deciding whether to make a referral by
344 liaising with relevant agencies so that children's needs are considered holistically.
- 345 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,
346 where safeguarding concerns are linked to mental health.
 - 347 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child
348 or adult) and, where appropriate, the Local Authority Designated Officer (LADO).
 - 349 • Liaise with the headteacher or principal (if they are not the DSL themselves) to inform him or her of
350 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police
351 investigations. This should include being aware of the requirement for children to have an Appropriate
352 Adult. Further information can be found in the statutory guidance - [PACE Code C 2019](#).
 - 353 • As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for
354 child protection concerns in cases which concern a staff member.
 - 355 • Refer cases to the Channel programme where there is a radicalisation concern as required.
 - 356 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the
357 Disclosure and Barring Service as required; and
 - 358 • Refer cases where a crime may have been committed to the police as required. [NPCC - When to call](#)
359 [the police](#) should help understand when to consider calling the police and what to expect when
360 working with the police.
 - 361 • Act as a source of advice, support and expertise within the location when deciding to make a referral
362 by liaising with relevant agencies.
 - 363 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and
364 child protection issues that children are experiencing, or have experienced, with teachers and school
365 and college leadership staff.
 - 366 • Identify staff safeguarding training needs and organise training for their staff.
 - 367 • Participate in local safeguarding boards when required.
 - 368 • Evaluate and contribute to high standards of safeguarding practice at the location.
 - 369 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are
370 guarded from harm or abuse.
 - 371 • Ensure the child protection and safeguarding policy is available publicly and parents/those with
372 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be
373 made and the role of the school/college/home in this.
 - 374 • Understands the relevant data protection legislation and regulations, especially The Data Protection
375 Act 2018.
- 376 6.5. More details about the role of the DSL including their availability, management of referrals, information
377 sharing, working with others, raising awareness and other can be found in [KCSIE 2023 Annex C - Role of](#)
378 [the DSL](#)
- 379 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where
380 asked do to so. There are arrangements for covering the role of the DSL when Stephen Doughty is
381 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team
382 lead by a DSL with a number of deputies where required. Our Designated Deputies are Carey Chandler,
383 Karen Truman, Johanna Coker, Michele Nicholas and Rose Pre Kouadio.
- 384
385
- 386 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected
387 abuse and neglect should be given the highest priority.
- 388 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and**
389 **Safeguarding at Cambian**.
- 390 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps
391 to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff
392 must use the correct forms when recording and managing concerns and allegations regarding the abuse

393 of individuals. Education services must use Behaviour Watch or My Concern systems:
394 Concern/Safeguarding function to record concerns. Where, throughout this policy, references are made
395 to the 'concern form' this means either **25.04 Concern form** which is a word document (part of this policy)
396 or the Behaviour Watch/My Concern– Concern/Safeguarding functionality where the system is being
397 used.

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

399 6.10. **The DSL** is responsible for ensuring that child protection files are kept up to date. Information should be
400 kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child
401 protection file for each child. Schools and colleges should use the Behaviour Watch/My Concern system
402 - Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs per
403 child/young person as necessary.

404 6.11. Records should include:

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

408 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content
409 within it is shared, this happens in line with information sharing advice as set out in [KCSIE 2023](#) and
410 [Information sharing advice for safeguarding practitioners](#).

411 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**
412 **each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school or
413 college additional options to contact a responsible adult when a child missing education is also identified
414 as a welfare and/or safeguarding concern.

415 **LADO referral criteria (KCSIE2023) – meeting the harm thresholds**

416 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if they
417 continue to work in regular or close contact with children in their present position, or in any capacity with
418 children in a school or college. This guidance should be followed where it is alleged that anyone working
419 in the school or college that provides education for children under 18 years of age, including supply
420 teachers, volunteers and contractors has:

- 421 • behaved in a way that has harmed a child, or may have harmed a child, and/or,
- 422 • possibly committed a criminal offence against or related to a child, and/or,
- 423 • behaved towards a child or children in a way that indicates he or she may pose a risk of
424 harm to children; and/or,
- 425 • behaved or may have behaved in a way that indicates they may not be suitable to work
426 with children

427 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the](#)
428 [Children Act 1989 as amended by the Adoption and Children Act 2002](#).

429 6.16. The last bullet point above includes behaviour that may have happened outside of school or college that
430 might make an individual unsuitable to work with children; this is known as transferable risk. Where
431 appropriate an assessment of transferable risk to children with whom the person works should be
432 undertaken. If in doubt, seek advice from the local authority designated officer (LADO).

433 6.17. This above information relates to members of staff, supply staff and volunteers who are currently working
434 in any school or college regardless of whether the school or college is where the alleged abuse took place.

435 Allegations against a teacher who is no longer teaching should be referred to the police. Historical
436 allegations of abuse should also be referred to the police.

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

438 6.18. Many children and young people in our services (education and care) have an allocated social worker due
439 to safeguarding or welfare needs.

440 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's
441 experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally
442 disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

443 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this
444 information so that decisions can be made in the best interests of the child's safety, welfare and
445 educational outcomes. This should be considered as a matter of routine. There are clear powers to share
446 this information under existing duties on both local authorities and schools and colleges to safeguard and
447 promote the welfare of children.

448 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,
449 responding to unauthorised absence or missing education where there are known safeguarding risks) and
450 about promoting welfare (for example, considering the provision of pastoral and/or academic support,
451 alongside action by statutory services). Schools/colleges must follow missing from education protocol
452 agreed with their LA.

453 6.22. Children missing from education, particularly persistently, can act as a vital warning sign to a range of
454 safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county
455 lines. It is important the school or college's response to children missing from education supports
456 identifying such abuse and helps prevent the risk of them going missing in the future. More information
457 can be found in [para 175 of KCSIE 2023](#)

458 **Unexplained body marks**

459 6.23. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,
460 swellings, cuts and scratches which by and large will be as a result of daily activities or for some individuals
461 as a result of self-injurious behaviour. A concern form must be completed for all unexplained marks and
462 physical changes and passed to the DSL (or a deputy) along with copies of the last 3 days of Daily Diary
463 notes and Activity Records. Parents/carers and social workers should always be kept informed. Concern
464 log should be updated with concern and relevant reference number provided to concern.

465 6.24. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
466 correct course of action for dealing with unexplained body marks.

467 6.25. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no
468 reasonable explanation can be given the DSL must contact the local Safeguarding Authority for further
469 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

470 6.26. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
471 opened and safeguarding process followed.

472 6.27. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
473 must be shared with social worker and parents.

474 **Disclosure from an Individual**

475 6.28. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
476 **procedure.**

477 6.29. It is important to note that children/young people may not find it easy to tell staff about their abuse
478 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react
479 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a
480 member of school or college staff may overhear a conversation that suggests a child has been harmed or
481 a child's/young person's own behaviour might indicate that something is wrong. If staff have any

- 482 concerns about a child's/young person's welfare, they should act on them immediately rather than wait
483 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**
484 **procedure.**
- 485 6.30. In case of reports of sexual violence and sexual harassment between children and young people, these
486 are extremely complex to manage. It is essential that victims are protected, offered appropriate support
487 and every effort is made to ensure their education and care is not disrupted. It is also important that
488 other children, young people and staff are supported and protected as appropriate.
- 489 6.31. The service's initial response to a report from a child is incredibly important. How the staff respond to a
490 report can encourage or undermine the confidence of future victims of sexual violence and sexual
491 harassment to report or come forward.
- 492 6.32. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.
493 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage
494 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding
495 Authority) to discuss next steps. Staff should only share the report with those people who are necessary
496 in order to progress it. It is important that the victim understands what the next steps will be and whom
497 the report will be passed to.
- 498 6.33. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how
499 the report will be progressed, don't ask leading questions and only prompt the child where necessary
500 with open questions – where, when, what, etc. It is important to note that whilst leading questions should
501 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- 502 6.34. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or
503 college staff. It is important that the person to whom the child discloses recognises that the child has
504 placed them in a position of trust. They should be supportive and respectful of the child.
- 505 6.35. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report
506 and immediately write up a thorough summary. This allows the staff member to devote their full
507 attention to the child and to listen to what they are saying. It may be appropriate to make notes during
508 the report (especially if a second member of staff is present). However, if making notes, staff should be
509 conscious of the need to remain engaged with the child and not appear distracted by the note taking.
510 Either way, it is essential a written record is made using Concern form which is part of this policy. The
511 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report
512 to the DSL must be completed within an hour from the moment of the disclosure being made.
- 513 6.36. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of
514 the note taker. Staff should be aware that notes of such reports could become part of a statutory
515 assessment by Safeguarding Authority and/or part of a criminal investigation.
- 516 6.37. In cases where either a child/young person informs the staff that an act of FGM – however described –
517 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that
518 an act of FGM has been carried out these situations, the police must be informed. The DSL should also be
519 informed who will trigger child protection/safeguarding procedures described in this policy. If a
520 child/young person is at immediate risk – the Police (999) must be contacted immediately. If a

521 child/young person required medical attention, follow steps identified in ‘**Setting priorities**’ section
522 below.

523 6.38. Remember, **do not**:

- 524 • Investigate the incident
- 525 • Ask leading questions
- 526 • Get the young person to repeat the disclosure over and over
- 527 • Make assumptions or offer alternative explanations
- 528 • Approach/inform the alleged abuser

529 6.39. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**
530 **and recording procedure.**

531 6.40. All staff know that they can contact the Local Authority direct should that be necessary. Where a
532 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding
533 Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt
534 with by the local Safeguarding Adult Board.

535 6.41. For allegation made against a staff member or senior managers/directors follow relevant allegations
536 procedures described later on in this policy.

537 6.42. Where contact is made with the Local Authority in which Cambian Bletchley Park School is geographically
538 located, contact will also be made with the individual’s own Local Authority and also the child/young
539 person’s social worker. This will be completed by one of the members of the school safeguarding team.

540 6.43. In the case of serious harm, and/or the individual is in immediate danger the local police should be
541 informed immediately and they can take immediate protective action as necessary.

542 6.44. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
543 senior manager, a Director of the Company or contact Ofsted, the local safeguarding boards, the police
544 or the **Whistleblowing Hotline – on 0800 086 9128.**

5 Risk Assessment

546 6.45. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk
547 and needs assessment. Where there has been a report of sexual harassment, the need for a risk
548 assessment should be considered on a case-by-case basis. The risk and needs assessment should
549 consider:

- 550 • the victim, especially their protection and support,
- 551 • whether there may have been other victims,
- 552 • the alleged perpetrator(s); and
- 553 • all the other children, (and, if appropriate, adult students and staff) at the school or college
554 especially, and any actions that are appropriate to protect them from the alleged
555 perpetrator(s), or from future harms.
- 556 • The time and location of the incident, and any action required to make the location safer.

557 6.46. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times,
558 staff should be actively considering the risks posed to all their pupils and students and put adequate
559 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are
560 engaging with Safeguarding Authority and specialist services as required. Where there has been a report
561 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence
562 specialists will be required. The above school or college risk assessment is not intended to replace the
563 detailed assessments of expert professionals. Any such professional assessments should be used to

564 inform the school's or college's approach to supporting and protecting their pupils and students and
565 updating their own risk assessment.

566 **Following a report - what to consider**

567 6.47. Important considerations will include:

- 568 • the wishes of the victim in terms of how they want to proceed. This is especially important in
569 the context of sexual violence and sexual harassment. Victims should be given as much control
570 as is reasonably possible over decisions regarding how any investigation will be progressed and
571 any support that they will be offered. This will however need to be balanced with the school's
572 or college's duty and responsibilities to protect other children;
- 573 • the nature of the alleged incident(s), including whether a crime may have been committed
574 and/or whether harmful sexual behaviour HSB has been displayed;
- 575 • the ages of the children involved;
- 576 • the developmental stages of the children involved;
- 577 • any power imbalance between the children. For example, is the alleged perpetrator(s)
578 significantly older, more mature or more confident? Does the victim have a disability or
579 learning difficulty?
- 580 • if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be
581 accompanied by other forms of abuse and a sustained pattern may not just be of a sexual
582 nature);
- 583 • that sexual violence and sexual harassment can take place within intimate personal
584 relationships between children/young people/adults;
- 585 • importance of understanding intra familial harms and any necessary support for siblings
586 following incidents
- 587 • are there ongoing risks to the victim, other children, adult students or school or college
588 staff; and
- 589 • other related issues and wider context, including any links to child sexual exploitation and
590 child criminal exploitation.

591 6.48. As always when concerned about the welfare of a child, all staff should act in the best interests of the
592 child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout
593 this guidance. Immediate consideration should be given as to how best to support and protect the victim
594 and the alleged perpetrator(s) (and any other children involved/impacted).

595 **Options to manage the report**

596 6.49. It is important that schools and colleges consider every report on a case-by-case basis. When to inform
597 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going
598 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college
599 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be
600 informed of the allegations. However, as per general safeguarding principles, this does not and should
601 not stop the school or college taking immediate action to safeguard their children, where required.

602 6.50. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual
603 violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are
604 regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly
605 important to look out for potential patterns of concerning, problematic or inappropriate behaviour.
606 Where a pattern is identified, the school or college should decide on a course of action. Consideration
607 should be given as to whether there are wider cultural issues within the school or college that enabled

608 the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training
609 could be delivered to minimise the risk of it happening again. The four scenarios are:

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- **Manage internally;** In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
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- **Early help:** In line with the above, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. It is particularly important that the DSL (and their deputies) know what the Early Help process is and how and where to access support.
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- Schools and colleges, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.
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- **Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to the local Safeguarding Authority. At the point of referral, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
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- **Reporting to the Police** - any report to the police will generally be in parallel with a referral to children's social care (as above. It is important that the DSL and their deputies) are clear about the local process for referrals and follow that process.

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

638 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider
639 whether the child and/or the person who has made the allegation needs help or may have been abused
640 by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding authority may
641 be appropriate.

642 6.52. If a report is shown to be deliberately invented or malicious, the school or college should consider
643 whether any disciplinary action is appropriate against the individual who made it as per their own
644 behaviour policy.

645 **Safeguarding and supporting the victim**

646 6.53. The needs and wishes of the victim should be paramount (along with protecting the child)/young person
647 in any response. It is important they feel in as much control of the process as is reasonably possible.
648 Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall,
649 the priority should be to make the victim's daily experience as normal as possible, so that the school or
650 college is a safe space for them.

651 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the
652 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual

653 violence and sexual harassment, a power imbalance is likely to have been created between the victim
654 and alleged perpetrator(s).

655 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel
656 ashamed for making a report. This has been made clear throughout this policy and procedure.

657 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
658 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
659 from that for a report of rape.

660 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,
661 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a
662 health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault
663 Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors
664 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children
665 and adults, regardless of when the incident occurred.

666 6.58. Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and
667 practical support for victims of sexual violence. They are based within the specialist sexual violence sector
668 and will help the victim understand what their options are and how the criminal justice process works if
669 they have reported or are considering reporting to the police. ChISVAs will work in partnership with
670 schools and colleges to ensure the best possible outcomes for the victim.

65 Safeguarding and supporting the alleged perpetrator(s)

672 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice:
673 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles
674 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding
675 and supporting the alleged perpetrator(s):

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

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

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

691 • It is important that the perpetrator(s) is/are also given the correct support to try to stop
692 them re-offending and to address any underlying trauma that may be causing this

693 behaviour. Addressing inappropriate behaviour can be an important intervention that
694 helps prevent problematic, abusive and/or violent behaviour in the future.

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

698 **Setting priorities**

699 6.60. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
700 safety of the individual.

701 6.61. Where appropriate, any concerns will be discussed with the individual's family / carers and where
702 possible their agreement will be sought to making a referral to the Local Authority. However, where
703 there is a conflict of interests between the Individual and parent/guardian, the interests of the individual
704 must take priority and [Cambian Bletchley Park School the right to contact the individual's local authority,
705 social care or the police, without notifying parents/carers if this is in their best interests.

706 6.62. If an urgent medical, attention or advice is required and GP/specialist doctor is not available, staff MUST
707 use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.

708 6.63. If the situation is life-threatening, staff must call 999 immediately and ask for an ambulance. Alternatively,
709 if it is assessed to be in the best interest of the child/young person - the DSL MUST take the Individual to
710 the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority/Police,
711 remembering that every reasonable effort should be made to inform the parents/carers as soon as
712 possible.

713 6.64. If the suspected abuse is sexual, then the medical professional must determine if the medical examination
714 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility
715 that the needs of the young person are such that medical attention is the priority, in such case medical
716 professional's judgment must be followed. There must at all times be an appropriate adult (parent,
717 guardian or a social worker) with the individual whether from the individual's care home/school/college,
718 the Local Authority or the Police, if the parents/carers are not included. This section must be read in
719 conjunction with our **0.29. Child Sexual Exploitation policy**.

720 6.65. Cambian will provide an advocate to each individual where appropriate, if they are unable to speak for
721 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to the Mental
722 Capacity Act. Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

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

724 6.66. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for
725 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual
726 is suffering or likely to suffer significant harm'. DSL must refer individual-on-individual abuse including
727 child on child/young adult on young adult or between individuals of a different age or other to a
728 Safeguarding Authority, local authority and regulator.

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

730 6.67. If we were given information that suggested that someone who does not reside at or attends our location
731 has been abused by one of our members of staff, the DSL would immediately report this to the Local
732 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted.
733 Should the staff member be involved we would then formally advise the member of staff of the allegation,
734 making it clear that we would not play any part in the investigatory process. The employee would be
735 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived
736 risks) etc., in exactly the same way as if the allegation had involved an Individual at our school. However,
737 the HR Business Partner must be consulted before any action is taken. If the allegation were subsequently
738 proved to be unfounded, he or she would be given full support in resuming their career. Should we be
739 asked by LADO/Safeguarding authority to be involved in any potential investigations or parts of it, an HR

740 Business Partner will have to be consulted first. At this point, an assessment will need to be made to
741 identify what detail (if any) can be disclosed to a member of staff involved.

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

743 6.68. If we were given information that suggested that someone who does not reside at or attends our location
744 has been abused by a third party (known or unknown to the provision), the DSL would immediately report
745 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice
746 provided by the leading agency and report back to the Head of Service who will explore any associated
747 risk/s in relation to the provision.

7 Allegations against staff

749 6.69. All allegations must be reported to the DSL Stephen Doughty or in their absence to a DSL Deputy – see
750 your local Safeguarding poster. In addition, where appropriate - HR Business Partner must be consulted.

751 6.70. When an allegation is made against a member of staff, set procedures must be followed, see the flow
752 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.

753 6.71. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed
754 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with
755 fairly, quickly and consistently and to be kept informed of its progress.

756 6.72. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided
757 for what to do in the event an allegation is made against them.

7 Allegations against staff in Education

759 6.73. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.
760 The allegations are split into two groups:

- 761
- Allegations that may meet the harm threshold (see **LADO referral criteria**) – **meeting the harm threshold** of this policy)
 - Allegation/concerns that do not meet the harms threshold – referred in the guidance and this policy as ‘low - level concerns’ - **Appendix 11. Low – level concerns (Education)**.
- 763
- 764

765 6.74. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they
766 continue to work in regular or close contact with children in their present position, or in any capacity with
767 children in a school or college.

768 6.75. The information above relate to members of staff, supply staff, volunteers and contractors who are
769 currently working in any school or college regardless of whether the school or college is where the alleged
770 abuse took place. It is advised that in Education allegations against people listed above should be referred
771 to the Head/Principal who is often the DSL, however where the Head/Principal is not the DSL, allegations
772 against staff including supply, volunteers and contractors must be referred to the Head/Principal who
773 may liaise with the DSL. This is because the concern/allegation may align with other performance or
774 personal related issues the Head/Principal might already be aware of, whereas the DSL may not be. The
775 Principal/Head should ensure the DSL is briefed as appropriate and will then decide whom the case should
776 be led by – the DSL or themselves. Allegations against a teacher who is no longer teaching should be
777 referred **to the police** and HR Business Partner advised.

778 6.76. Where an adult makes an allegation to a school or college that they were abused as a child, the individual
779 should be advised to report the allegation to the police. Non-recent allegations made by a child, should
780 be reported to the LADO in line with the local authority’s procedures for dealing with non-recent
781 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no
782 matter how long ago it happened.

783 6.77. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher
784 because of serious misconduct, or might have dismissed them or ceased to use their services had they
785 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching

786 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found
787 on GOV.UK.
788

7 Allegations against supply teachers and all workers supplied by agency

790 6.78. In some circumstances schools and colleges will have to consider an allegation against an individual not
791 directly employed by them, where its disciplinary procedures do not fully apply because agencies will
792 have their own policies and procedures; for example, supply teachers or contracted staff provided by an
793 employment agency or business.

794 6.79. Whilst the organisation's schools and colleges are not the employer of supply teachers, they should
795 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease
796 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the
797 LADO to determine a suitable outcome. Schools and colleges must also consult the HR Business Partner
798 who may advise further. Governance boards and proprietors should discuss with the supply agency or
799 agencies where the supply teacher is working across a number of schools or colleges, whether it is
800 appropriate to suspend the supply teacher, or redeploy them to another part of the school or college,
801 whilst they carry out their investigation.

802 6.80. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
803 children's social care. The school or college will usually take the lead because agencies do not have direct
804 access to children or other school or college staff, so they will not be able to collect the facts when an
805 allegation is made, nor do they have all the relevant information required by the LADO as part of the
806 referral process.

807 6.81. When using a supply agency, schools and colleges should inform the agency of its process for managing
808 allegations but also take account of the agency's policies and investigatory process and their duty to refer
809 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or
810 equivalent to meetings and keeping them up to date with information about its policies. It is important
811 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be
812 consulted.
813

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

815 6.82. All allegations must be reported to:

816 - Education division: Regional Education Lead Jarlath O'Brien. For the DSL fulfilling the role
817 as their substantive role, all allegations must be reported to the Headteacher.

818 6.83. Depending on the division and who is the service DSL, people notified of allegation made (see above) will
819 then refer the matter to LADO and notify their line manager:

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

821 - Managing Director for Education Andrew Sutherland. In Independent schools – the
822 Proprietor must also be notified.

823 6.84. The person who referred the matter to local LADO in line with agreed course of action will decide about
824 who will lead the case including management investigation – should the allegation threshold be met. The
825 appropriate HR Business Partner should be notified, so they can advise and where required - support the
826 investigation.

8 Allegations against the Regional Manager/other Regional staff

828 6.85. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the Headteacher)
829 who will make the initial referral to LADO. Following this, the allegation should be passed to the identified
830 senior person to follow through with LADO and subsequently act in line with agreed course of action. This
831 means that the DSL will retain the responsibility to report the initial concern, but will have no further part

832 in the process regarding gathering any information or, should it be required, in the actual investigation
833 in relation to a senior member.

834 6.86. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to
835 LADO and act in line with agreed course of action.

836 6.87. The appropriate HR Business Partner should be notified, so they can advise and where required - support
837 the investigation.

838 Allegations against the Operations Directors or Managing Director

839 6.88. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
840 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
841 to the identified senior person to follow through with LADO and subsequently act in line with agreed
842 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
843 will have no further part in the process regarding gathering any information or, should it be required, in
844 the actual investigation in relation to a senior member.

845 6.89. Allegations not linked to specific site must be reported to Managing Director for Education who will refer
846 the matter to LADO and act in line with agreed course of action.

847 6.90. The Head of HR should be notified, so they can advise and where required - support the investigation.

848 Allegations against any other Senior Leader

849 6.91. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
850 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
851 to the identified senior person to follow through with LADO and subsequently act in line with agreed
852 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
853 will have no further part in the process regarding gathering any information or, should it be required, in
854 the actual investigation in relation to a senior member.

855 6.92. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)
856 line manager who will refer the matter to LADO and act in line with agreed course of action.

857 6.93. The Head of HR should be notified, so they can advise and where required - support the investigation.

858 Allegations against the Executive Head of Children's Services

859 6.94. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
860 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
861 to the identified senior person to follow through with LADO and subsequently act in line with agreed
862 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
863 will have no further part in the process regarding gathering any information or, should it be required, in
864 the actual investigation in relation to a senior member.

865 6.95. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
866 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

867 6.96. The Head of HR should be notified, so they can advise and where required - support the investigation.

868 Allegations against the Chief Executive Officer

869 6.97. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
870 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
871 to the identified senior person to follow through with LADO and subsequently act in line with agreed
872 course of action. This means that the DSL will retain the responsibility to report the initial concern, but

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

875 6.98. Allegations not linked to specific site must be reported to reported to Executive Director Compliance –
876 Amanda Sherlock who will refer the matter to LADO and act in line with agreed course of action.

877 6.99. The Head of HR should be notified, so they can advise and where required - support the investigation.

878 **Allegations - The initial response**

879 6.100. Where the school or college identifies a child/young person has been harmed, that there may be an
880 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact
881 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
882 two aspects to consider when an allegation is made:

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

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

889 6.101. When dealing with allegations, schools and colleges should:

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

893 6.102. Schools and colleges should ensure they understand the local authority arrangements for managing
894 allegations, including the contact details and what information the LADO will require when an allegation
895 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with
896 local procedures to establish the facts to help them determine whether there is any foundation to the
897 allegation, being careful not to jeopardise any future police investigation. For example:

- 898 • **was the individual in the school or college at the time of the allegations?**
- 899 • **did the individual, or could they have, come into contact with the child?**
- 900 • **are there any witnesses? and,**
- 901 • **was there any CCTV footage?**

902 6.103. These are just a sample of example questions. Services should be familiar with what initial information
903 the LADO will require. This information can be found in local policy and procedural guidance provided by
904 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared
905 with the HR department to support any investigation.

906 6.104. When to inform the individual of the allegation should be considered carefully on a case-by-case basis,
907 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

908 6.105. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
909 involving the police and/or children’s social care will be convened in accordance with the statutory
910 guidance [Working Together to Safeguard Children](#).

911 6.106. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
912 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps
913 with the case manager (A ‘case manager’ will be the person leading any investigation. In most cases this
914 will be a senior leader from outside the school/home). The LADO should be informed who will lead the

915 investigation to ensure there is no conflict of interest or any other concerns related to the choice of the
916 case manager.

917 Further Action

918 6.107. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO
919 should:

- 920
- record the decision and justification for it; and,
- 921
- agree on what information should be put in writing to the individual concerned and by
922 whom.

923 Further enquiries

924 6.108. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
925 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,
926 the investigation should normally be undertaken by a senior member of the school's or college's staff.

927 6.109. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
928 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
929 Lead (Education or Care), a Director, HR Business Partner or an independent investigator if appropriate.

930 6.110. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as
931 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,
932 depending on the complexity of the case.

933 6.111. Wherever possible, the first review should take place no later than four weeks after the initial
934 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
935 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges
936 when considering allegations against adults working with children. The LADO's role is not to investigate
937 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,
938 children's social care, the school or college, or a combination of these.

939 Suspension

940 6.112. Suspension should not be an automatic response when an allegation is reported. All options to avoid
941 suspension should be considered prior to taking that step. The case manager must consider carefully
942 whether the circumstances warrant suspension from contact with children at the school or college, or
943 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a
944 child or other children at the school or college is/are at risk of harm, or the allegation could be considered
945 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR
946 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been
947 involved. More information on suspension and associated process can be found in [KCSIE 2023 Part 4 -
948 Suspension](#).

949 Supporting those involved

950 6.113. The welfare of a child/young person is paramount) and this will be the prime concern in terms of
951 investigating an allegation against a person in a position of trust. However, when an allegation or
952 safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject
953 of the investigation, and potentially for the family members. It is important that an employer offers
954 appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is
955 confidential and should not ordinarily be shared with the other staff or with children or parents who are

956 not directly involved in the investigation. More about employer's duty of care to their employees can be
957 found in the KCSIE2023 guidance.

958 6.114. Staff whom allegation/s have been made against must always be supported and if suspended they will
959 receive a support person (nominated contact), any suspension is not an indication of guilt.

960 Allegation outcomes

961 6.115. The definitions that should be used when schools and colleges determine the outcome of an allegation
962 are set out below:

- 963 • Substantiated: there is sufficient evidence to prove the allegation;
- 964 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
965 deliberate act to deceive or cause harm to the person subject of the allegation;
- 966 • False: there is sufficient evidence to disprove the allegation;
- 967 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
968 The term, therefore, does not imply guilt or innocence; or
- 969 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the
970 allegation being made.

971 6.116. It should be noted that these definitions are available to support the decision-making process. However,
972 in certain cases, in the absence of any substantiating evidence, the Company may still progress through

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

975 6.117. Ultimately, the options open to the school or college depend on the nature and circumstances of the
976 allegations and the evidence and information available. This will range from taking no further action, to
977 dismissal or a decision not to use the person’s services in future.

978 Serious incident reporting

979 6.118. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
980 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

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

982 6.119. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
983 rapid response, process described below:

- 984 • Call the Ambulance and Police
- 985 • Unless the 999 operator tells you to, do not touch the person; do not move anything
986 around them, which may form part of forensic evidence. Police will decide about the
987 forensic examinations and appropriate security of the scene.
- 988 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI)
989 reporting procedure. The DSL will contact the Managing Director of the division they work
990 in and verbally inform them of what happened before completing SUI Part 2.
- 991 • DSL will contact Children’s/Adults Social Care Team
- 992 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health
993 Services (CAMHS) should also be notified by the Safeguarding Authority.

994 6.120. Once the above rapid steps have been taken, further steps described below must be followed.

995 6.121. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
996 following within 24 hours:

- 997 • Group Executive Director Managing Director, Responsible/Nominated Individual, Regional
998 Lead following the **35.01. Caretech Children’s services SUI process.**
- 999 • Next of kin/parents/carers of the deceased.
- 1000 • Where the death of an individual occurs in an education location the assistance of the
1001 local police and social services department should be sought in informing the
1002 parents/guardians.
- 1003 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
- 1004 • Ministry of Justice if applicable.
- 1005 • The placing authority/authorities.
- 1006 • The local authority responsible for Social Services and Education (where the death takes
1007 place in a registered school) within whose area the education location is situated.
- 1008 • The District Health Authority within whose area the education location is situated.
- 1009 • The Department for Education, (where the death takes place in a registered school).
- 1010 • The Health and Safety Executive.

1011 Abuse of position of trust

1012 6.122. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1013 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1014 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1015 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1016 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1017 is over the age of consent.

1018 **Visitors**

1019 6.123. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.
1020 All unauthorised visitors will be challenged by staff and reported to the home
1021 manager/headteacher/principal before entry is authorised.

1022 **Volunteers**

1023 6.124. Volunteers undergo checks commensurate with their work in the home/school/college and contact with
1024 children, young people and adults i.e. if they are in regulated activity or not.

1025 **Contractors**

1026 6.125. We will check the identity of all contractors working on site and request the full range of DBS and other
1027 required checks where they work in regulated activity or unsupervised in accordance with the latest
1028 government guidance.

1029 **Use of school or college premises for non-school/college activities**

1030 6.126. Where governance boards or proprietor hire or rent out school or college facilities/premises to
1031 organisations or individuals (for example to community groups, sports associations, and service providers
1032 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in
1033 place to keep children safe.

1034 **Extended school and off-site arrangements**

1035 6.127. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1036 procedures apply. If other organisations provide services or activities on our site we will check that they
1037 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1038 whose procedure is to be followed if there are concerns. There will be clear communication channels to
1039 ensure the DSL is kept appropriately informed.

1040 6.128. When our Individuals are doing off-site activities, including day and residential visits and work-related
1041 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL
1042 will be kept appropriately informed.

1043 **Use of mobile phones**

1044 6.129. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1045 access including **Pro 01. Mobile Telephony Policy** at all times.

1046 6.130. All computer equipment and internet access within the home/school/college is subject to 'parental
1047 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1048 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons
1049 during working hours. Staff need to help our Individuals to prepare for the dangers of the internet and

1050 social media whilst promoting the many learning and social opportunities available through the internet
1051 and social media.

1052 6.131. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST
1053 neither mention Bletchley Park School or refer to their employment at the school. Staff are advised not
1054 to communicate with parents, guardians, carers or Individuals via social networking sites

1055 **Photography and images**

1056 6.132. This section should be read in conjunction to our **GIG 02. Data Protection policy.**

1057 6.133. The vast majority of people who take or view photographs or videos of individuals do so for entirely
1058 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through
1059 taking or using images, so we have some safeguards in place.

1060 6.134. To protect our children, young people or young adults we will:

- 1061 • seek their consent for photographs to be taken or published (for example, on our website
1062 or in newspapers or publications)
- 1063 • seek parental consent of consent from the Individual
- 1064 • not use their full name with an image, only their initials
- 1065 • ensure that personal data is not shared
- 1066 • store images appropriately, securely and for no longer than necessary
- 1067 • only use school equipment, i.e. not personal devices
- 1068 • encourage our children, young people and adults to tell us if they are worried about any
1069 photographs that are taken of them

1070 **Physical intervention and use of reasonable force**

1071 6.135. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1072 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1073 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1074 recorded and monitored.

1075 **Staff taking medication or other substances**

1076 6.136. Staff members must not be under the influence of alcohol or any other substance, which may affect their
1077 ability to care for the individuals. If they are taking medication, they should seek medical advice and
1078 inform the Home Manager/Headteacher/Principal who will review the medical advice and take a decision
1079 as to whether they are fit for work.

1080 6.137. We only allow staff to work if medical advice confirms that their ability to look after individuals is unlikely
1081 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it
1082 must be securely stored and out of reach of all children, young people and young adults. This section
1083 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy.**

1084 **Information for individuals and relatives/carers**

1085 6.138. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt
1086 with independently and that they will be kept involved in the process to the degree that they wish to be.
1087 They will be reassured that they will receive help and support in taking action.

1088 6.139. They will also be advised that they can nominate an advocate or representative to speak and act on their
1089 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could
1090 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be
1091 appointed. They will be advised of rights to legal aid in where appropriate to victim support and
1092 compensation.

1093 **Recruitment and vetting**

1094 6.140. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1095 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1096 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1097 schools should read Part 3 of KCSIE2023 guidance dedicated to Safer Recruitment.

1098 6.141. Each education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1099 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1100 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1101 6.142. For agency workers we obtain written confirmation that all checks have been completed, in line with
1102 safer recruitment from the employment business that is supplying the member of agency staff. All
1103 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in
1104 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1105 before that person can begin work at the home/school/college.

1106 6.143. All locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1107 agency.

1108 6.144. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the
1109 same recruitment regulations and procedures as the education staff.

1110 Requirements to inform Disclosure and Barring Services (DBS)

1111 6.145. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the
1112 barred lists is required.

1113 6.146. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1114 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to
1115 safeguarding concerns, or would have been had they not resigned.

1116 6.147. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1117 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

1118 6.148. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1119 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1120 is considered unsuitable to work with children and young people.

1121 6.149. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1122 provided at paragraph 179.

1123 6.150. All managers must read the group leavers policy – all referrals must be recorded with HR so they can
1124 ensure any future references are correct. The references team log referrals so this can be completed. This
1125 will apply to both: DBS and TRA.

1126 Record keeping

1127 6.151. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is
1128 made, staff must keep clear and accurate records using a Concern Form.

1129 6.152. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in
1130 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns
1131 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch
1132 have Concern/Safeguarding function to record any concerns being raised. A report per child/young
1133 person can also be generated.

1134 6.153. Records should be factual, accurate, concise, ethical and relevant.

1135 6.154. All recording of written information should be legible and discussions with other professionals and
1136 agencies should be recorded chronologically.

1137 6.155. There will be a safeguarding section/folder for each Individual, which will hold any concerns/safeguarding
1138 documentation for that individual. At the front of each folder, there is an Index for Individual's Concerns.
1139 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1140 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure
1141 location.

1142 6.156. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**
1143 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information
1144 where the concern has escalated. Where this is held as a paper version this is to be made into a bound
1145 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies
1146 only. In either case, this should be kept in a secure location.

1147 **Monitoring**

1148 6.157. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,
1149 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**
1150 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators
1151 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the
1152 position of every site in relation to their KPIs is produced every Wednesday.

1153 **Training**

1154 6.158. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction
1155 introduces the new staff member to the policy, procedure and practice at the location. They will also be
1156 orientated as to where to find information regarding safeguarding including relevant posters around the
1157 location. As part of their induction all staff are required to read this policy and confirm that, they
1158 understand their role in safeguarding and protecting young people within the service they are going to
1159 work.

1160 6.159. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
1161 be completed as part of staff member induction and annually thereafter. This should include online
1162 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
1163 people/young adult's safeguarding.

1164 6.160. Staff will not be allowed to work with individuals unless they have completed the above training. The
1165 school/college/home must check that supply/agency staff have completed basic awareness training
1166 before being allowed into contact with Individuals.

1167 6.161. Contractors and others on site who might have unsupervised access to individuals must also complete
1168 basic awareness training before being allowed to start work.

1169 6.162. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
1170 practice throughout the year. This can be undertaken in various forums: as a face-to-face or online
1171 session, staff meetings or workshops. In addition to this, safeguarding updates including various
1172 resources are provided to schools and colleges by the external Safeguarding Network.

1173 6.163. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge
1174 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA
1175 within the boundaries they operate and be refreshed at least every two years. Both should also undertake
1176 Prevent awareness training.

1177 **Confidentiality and information sharing**

1178 6.164. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
1179 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
1180 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
1181 information as early as possible to help identify, assess and respond to risks or concerns about the safety
1182 and welfare of children/ young people whether this is when problems are first emerging, or where a child
1183 is already known to local authority children's social care.

1184 6.165. Where the police are involved, wherever possible the school or college should ask the police to obtain
1185 consent from the individuals involved to share their statements and evidence for use in the employer's

- 1186 disciplinary process. This should be done as their investigation proceeds and will enable the police to
1187 share relevant information without delaying the conclusion of their investigation or any court case.
- 1188 6.166. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
1189 whether the child or children named in the allegation need protection or services, so that any information
1190 obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the
1191 employer without delay.
- 1192 6.167. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
1193 following:
- 1194 • who needs to know and exactly what information can be shared;
 - 1195 • how to manage speculation, leaks and gossip
 - 1196 • what, if any, information can be reasonably given to the wider community to reduce speculation;
1197 and
 - 1198 • how to manage press interest if, and when, it should arise.
- 1199 6.168. Exchange or disclose of personal information with other agencies will be completed in accordance with
1200 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including
1201 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process
1202 personal information fairly and lawfully and to keep the information they hold safe and secure.
- 1203 6.169. Information relating to individual Safeguarding cases is confidential, although some information can be
1204 shared with relevant staff. This should be done only on a 'need to know' basis.
- 1205 6.170. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data
1206 protection principles, which allow them to share (and withhold) personal information, as provided for in
1207 the Data Protection Act 2018 and the GDPR. This includes:
- 1208 • being confident of the processing conditions which allow them to store and share
1209 information for safeguarding purposes, including information which is sensitive and
1210 personal, and should be treated as 'special category personal data'.
 - 1211 • understanding that 'safeguarding of children and individuals at risk' is a processing
1212 condition that allows practitioners to share special category personal data. This includes
1213 allowing practitioners to share information without consent where there is good reason
1214 to do so, and that the sharing of information will enhance the safeguarding of a child in
1215 a timely manner but it is not possible to gain consent, it cannot be reasonably expected
1216 that a practitioner gains consent, or if to gain consent would place a child at risk.
 - 1217 • for schools, not providing pupils' personal data where the serious harm test under the
1218 legislation is met. For example, in a situation where a child is in a refuge or another form
1219 of emergency accommodation, and the serious harms test is met, they must withhold

- 1220 providing the data in compliance with schools' obligations under the Data Protection Act
1221 2018 and the GDPR. Where in doubt schools should seek independent legal advice.
- 1222 6.171. When sharing safeguarding information regarding an individual, staff will need to consider the following:
- 1223 • Information should only be shared on a 'need to know' basis when it is in the best interests
1224 of the individual
 - 1225 • Informed consent should be obtained but, if this is not possible and other adults are at risk
1226 of abuse or neglect, it may be necessary to override the requirement
 - 1227 • Distinguish fact from opinion
 - 1228 • Ensure you are giving the right information about the right person
 - 1229 • Ensure you are sharing information securely
 - 1230 • Inform the person that the information has been shared if they were not already aware of
1231 this and if it would not create or increase risk of harm to them/others.
- 1232 6.172. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1233 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1234 need to safeguard and promote the welfare and protect the safety of children.
- 1235 6.173. Further details on information sharing can be found in:
- 1236 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting
1237 guide to information sharing
 - 1238 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children,
1239 Young People, Parents and Carers](#). The seven golden rules for sharing information will
1240 be especially useful
 - 1241 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and
1242 guidance from the department
 - 1243 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1244 activity, including compliance with the GDPR.
- 1245 6.174. The following wording is to be added to any covering letter where we are sharing documentation:
1246 "The material contained in this letter and its enclosures are confidential to Cambian Group and the
1247 persons named within the documentation. The documentation is delivered only in accordance with a
1248 perceived legal obligation to make the documentation available and upon the strict understanding that
1249 the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not
1250 in any way share the documentation or any details of the information therein contained with any other
1251 party. Any person receiving this information who breaches these obligations of confidentiality will be

1252 held strictly responsible and will be expected to indemnify Cambian Group and any persons named within
1253 the documentation against any losses that may arise as a result of misuse of this material”.

1254 6.175. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for
1255 the Caldicott Guardian at our location is Dr Vishelle Kamath, Group Medical Director for Caretech.

1256 6.176. Failure to follow this policy and local procedure may result in disciplinary action.

1260 **Complaints and Monitoring**

1258 6.177. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1259 **procedure**, with reference to the our Designated Safeguarding Officer who is Stephen Doughty (DSL) and
1260 Milton Keynes Safeguarding Children’s Board

1261 **7. Accountability**

1262 7.1. Stephen Doughty is the DSL at Cambian Bletchley Park School and has lead responsibility for protecting
1263 and safeguarding children, young people and young adults and liaising with the local authority and other
1264 local agencies as appropriate. This includes young person protections, referrals, raising awareness,
1265 training, allocating resources and supporting/directing staff within the Location. In all matters, relating
1266 to young person protection and safeguarding Cambian Bletchley Park School will follow the procedures
1267 outlined in this policy.

1268 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by
1269 the Head of Service. Our Managing Director, Andrew Sutherland will undertake a full annual review of
1270 the content and effective application of this policy and associated procedures. The date for the next
1271 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in
1272 legislation, regulatory requirements or as a result of best practice guidance.

1273 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1274 Compliance, who will support and promote the development of initiatives to improve the prevention,
1275 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1276 also responsible for reporting on safeguarding and providing executive leadership.

1277 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1278 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can
1279 be stressful and distressing for staff.

1280 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,
1281 allied health professionals and nurses) should understand how their professional standards and
1282 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1283 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1284 need to share a common view of what types of behaviour may be abuse or neglect and what should be
1285 an initial response to suspicion or allegation of abuse or neglect.

1286 7.7. All staff **MUST** make sure that they have familiarised themselves with their local multi-agency
1287 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies
1288 which define the local practice that must be followed.

1289 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1290 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact
1291 names and details if required.

1292 **8. Further Safeguarding information – what everyone needs to know**

1293 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours
1294 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual

1295 and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children
1296 are at risk.

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1298 **Appendix 1: Child Protection and safeguarding procedure (Flow chart)**

1299 DSL– DSL

CSC– Children’s Social Care

1300 CAF – Common Assessment framework

LADO – Local Authority Designated Officer

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STAFF

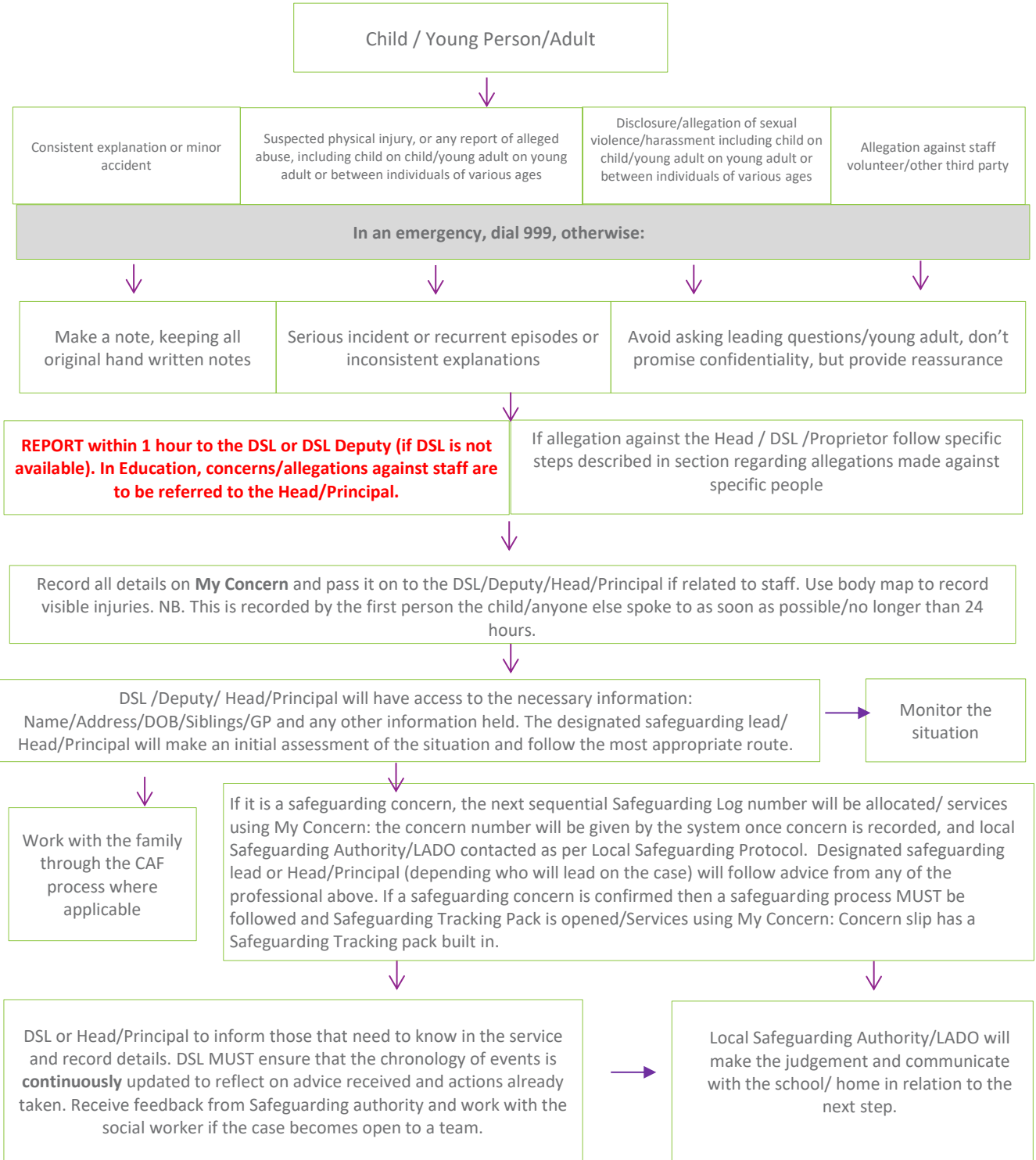
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1348 **Appendix 2: Types of abuse – children**

- 1349 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or
 1350 by failing to act to prevent harm. Children may be abused in a family or in an institutional or community
 1351 setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or
 1352 technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by
 1353 another child or children
- 1354 • **Physical abuse:** a form of abuse, which may involve hitting, slapping, shaking, throwing, poisoning,
 1355 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm
 1356 may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in
 1357 a child.
- 1358 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse
 1359 effects on the child’s emotional development. It may involve conveying to a child that they are worthless
 1360 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include
 1361 not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of
 1362 what they say or how they communicate. It may feature age or developmentally inappropriate
 1363 expectations being imposed on children. These may include interactions that are beyond a child’s
 1364 developmental capability as well as overprotection and limitation of exploration and learning, or
 1365 preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-
 1366 treatment of another. It may involve serious bullying (including cyberbullying), causing children
 1367 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of
 1368 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1369 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example
 1370 rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of
 1371 clothing. They may also include non-contact activities, such as involving children in the production of
 1372 sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children
 1373 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the
 1374 internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual
 1375 abuse, as can other children. The sexual abuse of children by other children or young adults by other
 1376 young adults or between individuals of different age is a specific safeguarding issue in education and all
 1377 staff should be aware of it and of their school or colleges policy and procedures for dealing with it.
- 1378 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an
 1379 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child
 1380 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or
 1381 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence
 1382 or the threat of violence. CSE and CCE can affect children, both male and female and can include children
 1383 who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual
 1384 Exploitation does not always involve physical contact; it can also occur through the use of technology.
- 1385 • **Neglect:** the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result
 1386 in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as
 1387 a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing
 1388 to: provide adequate food, clothing and shelter (including exclusion from home or abandonment);
 1389 protect a child from physical and emotional harm or danger; ensure adequate supervision (including the
 1390 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also
 1391 include neglect of, or unresponsiveness to, a child’s basic emotional needs.
- 1392 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through
 1393 social media, online games or other channels of digital communication. Children can also be re-victimised
 1394 if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal
 1395 abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child
 1396 sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual
 1397 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using
 1398 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that
 1399 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as
 1400 inappropriate behaviours or content online. For instance, children may be bullied online by other
 1401 children/young people/young adults they know/others who they don’t know or they might, either
 1402 accidentally or intentionally, view content, which is intended for adults. Both online abuse and exposure

1403 to unsuitable content or behaviour can have a long-lasting impact on the wellbeing of children and young
1404 people.

1405 **Appendix 3: Types of abuse - adults**

- 1406 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling,
1407 scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone
1408 purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding
1409 or withholding food, unauthorized restraint, restricting movement.
- 1410 • **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the
1411 honour of the family and/or the community including female genital mutilation (FGM), forced marriage
1412 and practices such as breast ironing. Abuse committed in the context of preserving “honour” often
1413 involves a wider network of family or community pressure and can include multiple perpetrators. It is
1414 important to be aware of this dynamic and additional risk factors when deciding what form of
1415 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be
1416 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant
1417 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered
1418 HBA.
- 1419 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse
1420 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence
1421 and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour,
1422 violence or abuse between those aged 16 or over who are or have been, intimate partners or family
1423 members regardless of gender or sexuality.
- 1424 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual
1425 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of
1426 the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to,
1427 inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced
1428 use of pornography or witnessing of sexual acts, Indecent exposure.
- 1429 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing
1430 services, educational and social opportunities and seeing friends, removing mobility or communication
1431 aids or intentionally leaving someone unattended when they need assistance, preventing someone from
1432 meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to
1433 respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,
1434 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a
1435 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1436 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from
1437 accessing their own money, benefits or assets, employees taking a loan from a person using the service,
1438 undue pressure, duress, threat or undue influence put on the person in connection with loans, wills,
1439 property, inheritance or financial transactions, arranging less care than is needed to save money to
1440 maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to
1441 access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in
1442 a family home, someone moving into a person’s home and living rent free without agreement or under
1443 duress, false representation, using another person's bank account, cards or documents, exploitation of a
1444 person’s money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy,
1445 appointee ship or other legal authority.
- 1446 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as
1447 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that
1448 realistically they never will be able to.
- 1449 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and
1450 civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as
1451 ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks or
1452 inappropriate use of language related to a protected characteristic, denying access to communication
1453 aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on
1454 the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and

- 1455 criminal justice relating to a protected characteristic, substandard service provision relating to a
1456 protected characteristic.
- 1457 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-
1458 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and
1459 supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful
1460 attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and
1461 privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or
1462 assistance with eating, not offering choice or promoting independence, misuse of medication, failure to
1463 provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious
1464 or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence
1465 or communication, failure to respond to complaints.
 - 1466 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,
1467 stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure
1468 to administer medication as prescribed, refusal of access to visitors, not taking account of individuals'
1469 cultural, religious or ethnic needs, not taking account of educational, social and recreational needs,
1470 ignoring or isolating the person, preventing the person from making their own decisions, preventing
1471 access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
 - 1472 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of
1473 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,
1474 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise
1475 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more
1476 appropriate under the parts of the Care Act dealing with assessment, planning, information and advice,
1477 and prevention.
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Appendix 4: Signs that someone could be a victim**1484 Physical abuse**

- 1485 • No explanation for injuries or an inconsistent account of what happened
- 1486 • Injuries that don't seem likely, given the person's lifestyle
- 1487 • Bruising, cuts, welts, burns, marks on the body or loss of hair in clumps
- 1488 • Frequent injuries
- 1489 • Unexplained falls
- 1490 • Subdued or changed behaviour in the presence of a particular person
- 1491 • Signs of malnutrition (not having enough to eat)
- 1492 • Failure to seek medical treatment or frequent changes of GP

1493 Sexual abuse

- 1494 • Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- 1495 • Torn, stained or bloody underclothing
- 1496 • Bleeding, pain or itching in the genital area
- 1497 • Unusual difficulty in walking or sitting
- 1498 • Foreign bodies in genital or rectal openings
- 1499 • Infections, unexplained genital discharge, or sexually transmitted diseases
- 1500 • Pregnancy in a child or young person who cannot consent to sexual intercourse
- 1501 • Using unexpectedly explicit sexual language
- 1502 • Major changes in sexual behaviour or attitude
- 1503 • Incontinence not to do with a medical condition
- 1504 • Self-harming
- 1505 • Poor concentration, withdrawal, sleep disturbance
- 1506 • Excessive fear of or withdrawal from relationships
- 1507 • Fear of receiving help with personal care
- 1508 • Not wanting to be alone with a particular person

1509 Psychological or emotional abuse

- 1510 • An air of silence when a particular person is present
- 1511 • Withdrawal or change in the psychological state of the person
- 1512 • Insomnia (not sleeping)
- 1513 • Low self-esteem
- 1514 • Uncooperative and aggressive behaviour
- 1515 • A change of appetite, weight loss or gain
- 1516 • Signs of distress: tearfulness, anger
- 1517 • Apparent false claims by someone involved with the person, to attract unnecessary treatment

1518 Neglect and acts of omission

- 1519 • Poor environment – dirty or unhygienic
- 1520 • Poor physical condition and/or personal hygiene
- 1521 • Pressure sores or ulcers
- 1522 • Malnutrition or unexplained weight loss
- 1523 • Untreated injuries and medical problems
- 1524 • Inconsistent or reluctant contact with medical and social care organizations
- 1525 • A build-up of medication that hasn't been taken
- 1526 • Uncharacteristic failure to engage in social interaction

1527 Unsuitable clothing or not enough clothes

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1529 **Domestic abuse**

- 1530 • becoming anxious or depressed
- 1531 • having difficulty sleeping
- 1532 • complaining of physical symptoms such as tummy aches
- 1533 • starting to wet their bed
- 1534 • behaving as though they are much younger than they are
- 1535 • having problems with school
- 1536 • becoming aggressive or they may internalise their distress and withdraw from other people
- 1537 • having a lowered sense of self-worth
- 1538 • older children may begin to play truant or start to use alcohol or drugs
- 1539 • they beginning to self-harm by taking overdoses or cutting themselves

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1541 **Child on Child/Young adult on young adult abuse/between individuals of different age**

- 1542 • absence from school or disengagement from school activities
- 1543 • physical injuries
- 1544 • mental or emotional health issues
- 1545 • becoming withdrawn – lack of self esteem
- 1546 • lack of sleep
- 1547 • alcohol or substance misuse
- 1548 • changes in behavior
- 1549 • inappropriate behavior doe age
- 1550 • abusive towards others

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Appendix 5: Signs that someone could be an abuser

- 1580 • Using restraint when it's not needed
- 1581 • Having favourites
- 1582 • Giving treats, presents or money to certain people without permission from a manager
- 1583 • Finding ways to spend time with a particular child, young person or young adult, perhaps by working
- 1584 longer hours or giving up free time
- 1585 • Finding ways to spend time alone with a particular child, young person or young adult , for example in
- 1586 a car or somewhere else
- 1587 • Inviting a particular child, young person or young adult at risk to their own house without permission
- 1588 from a manager
- 1589 • Being over-friendly with a child, young person or young adult's parents or guardians without permission
- 1590 from a manager
- 1591 • Taking photos of the child, young person or young adult that aren't for work purposes
- 1592 • Trying to make private contact with a particular child, young person or young adult , including by text,
- 1593 email, mobile phone, online or in letter
- 1594 • Finding ways to have physical contact, like play-fighting or tickling
- 1595 • Keeping collections of toys or other items that might attract children or people at risk
- 1596 • Controlling behaviour
- 1597 • Narcissistic characteristics
- 1598 • Bullying
- 1599 • Being forced into a sexual act
- 1600 • Humiliation
- 1601 • Constant yelling and shouting
- 1602 • The threat or use of violence
- 1603 • Destroying personal items
- 1604 • Limiting contact with family, friends and work colleagues
- 1605 • Checking up on your whereabouts
- 1606 • Accusing the child/young person (the victim), of committing the abuse when it is the other way around.

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1625 **Appendix 6: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**
1626 **and recording procedure**

- 1627 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1
1628 hour from the moment of disclosure/report from the child/young person/other person completes and
1629 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of
1630 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern is
1631 related to the staff and the Head/Principal is not available, staff must report their concern to the DSL
1632 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal
1633 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally before
1634 completing the Concern/Safeguarding slip in the system.

- 1635 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details
1636 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on
1637 the Concern Form. Services using My Concern – DSL/DSL Deputy or Head/Principal reviews the concern
1638 and decides on the next step which may lead to Safeguarding Tracking Pack being opened (Safeguarding
1639 Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).

- 1640 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or
1641 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on
1642 the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and
1643 immediately (or at least within one hour of receiving the concern form, make a referral to the local
1644 Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to discuss the
1645 allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the My Concern system
1646 will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible to the
1647 Safeguarding Team.

- 1648 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a
1649 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the
1650 Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal
1651 Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their
1652 Senior Management Team is assigned to look into the concern. The review must be recorded and
1653 outcomes shared with the people involved. Feedback from the review session MUST be provided to local
1654 Safeguarding Authority/LADO. Services using the My Concern system will follow the same set of steps
1655 apart from populating the Central Log of Concerns and Safeguarding as the log can be generated by the
1656 system using chosen filtering criteria.

- 1657 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken.
1658 This diligent approach will ensure a clear historic record of contact with local Safeguarding
1659 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with
1660 the local Safeguarding Authority/LADO whichever appropriate.

- 1661 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it
1662 requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must
1663 be opened with the next sequential Safeguarding Reference included on the form and details as such
1664 entered on the central log.

- 1665 • Services using the My Concern system – where a concern progresses to Safeguarding Tracking Pack being
1666 opened, a one record will be created including the original concern, with the whole document having the
1667 same slip number.

- 1668 • Services which don't use My Concern or where the concern/allegation is about the Head/Principal or the
1669 DSL who have access to BW: Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-
1670 5) should be submitted to the **Responsible/Nominated Individual and** in day schools - **Regional**
1671 **Education Manager** as a follow up to the initial reporting telephone contact. STP must be sent again to
1672 **Responsible/Nominated Individual and Regional Education Manager** on completion, providing detailed
1673 overview of the actions taken and the final outcome.. The **Responsible/Nominated Individual and**

- 1674 **Regional Education Manager** in day schools will update relevant Directors. This original form will be saved
1675 in the Safeguarding file/Behaviour Watch – Concern/SG module.
- 1676 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the
1677 local Police should be informed immediately as well and they can take immediate protective action as
1678 necessary.
- 1679 • If the matter is a more general concern then ensure that the ‘Action Taken’ log on My Concern is
1680 completed and the form is filed within the Safeguarding file. Either way the form must be signed by the
1681 DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use
1682 Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people,
1683 staff or children/young people and staff.
- 1684 • The relevant concern form should be referenced in the Individual’s **25.01 Index form for Individual
1685 concern/safeguarding file** and the site’s **25.07 Central Log of Concerns and Safeguarding**. Services using
1686 My Concern will be able to filer information per chosen criteria and also generate reports per each
1687 child/young person in the school, college, children’s or care homes.
- 1688 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack
1689 /Behaviour Watch Concern/SG module**.
- 1690 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed in
1691 writing that the concern is closed and Responsible/Nominated Individual and Regional Education
1692 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is
1693 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off
1694 have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the Safeguarding
1695 file.
- 1696 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local
1697 Authority and/or the police. The individual can be kept in their care home or on the school/college site
1698 fully supported (e.g. if they are a day student) if advised to do so.
- 1699 • The parent/carers should be informed and a decision should be made with the Local Authority and the
1700 Police about what action is to be taken and whom by.
- 1701 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been
1702 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an
1703 abuse referral but may help to clarify the situation but they must record all details of any conversation
1704 and advice received on a concern form. He/she can then move to a formal referral or actively monitor
1705 the situation.
- 1706 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or
1707 allegation of abuse directed against anyone working within the establishment. The establishment **MUST**
1708 not internally investigate any allegations of abuse without first taking instruction from the local
1709 Safeguarding Authority/LADO.
- 1710 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal
1711 management investigation (level 2), the investigation process will commence.
- 1712 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the
1713 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to
1714 assist the external agency to ensure the investigation is completed without a delay.
- 1715 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within
1716 the time frame specified by their regulator. This is regardless of who leads on the investigation and
1717 whether or not the investigation has been concluded.
- 1718 • If as the result of an investigation there has been a substantiated allegation against a member of staff,
1719 we will work with the local Safeguarding Authority/LADO to determine whether there are any
1720 improvements to be made to our safeguarding policy, procedures and practice to prevent similar events

1721 in the future. Also, we will work with our internal Human Resources department and may commence
1722 proceedings under **GHR 27. Disciplinary policy and procedure.**

- 1723 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.
1724 Records are kept of all conversations as part of the investigation process and made available as
1725 required.

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Appendix 7: Key contacts

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1762 **DSL** is Stephen Doughty

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1764 **Telephone (24hrs): 07876 791949****Email: Stephen.doughty@cambianguroup.com**

1765

1766

1767 **DSL Deputy** is Carey Chandler

1768

1769 **Telephone (24hrs): 07860 189842****Email: Carey.chandler@cambianguroup.com**

1770

1771 **Headteacher** is Laura Sharman

1772

1773 **Telephone (24hrs): 07860 189713****Email: Laura.sharman@cambianguroup.com**

1774

1775

1776 **Operations Director** is Andrew Sutherland

1777

1778 **Telephone (24hrs): 02087 356150****Email: Andrew.sutherland@caretech-uk.com**

1779

1780

1781 **Group Executive Director – Children’s Services** is Jeremy Wiles

1782

1783 **Telephone: 079190232207****Email: Jeremy.Wiles@caretech-uk.com**

1784

1785 **Group Lead Safeguarding** is Christina Leath (Compliance and Regulation)

1786

1787 **Telephone: 01707 601 800****Email: Christina.Leath@caretech-uk.com**

1788

1789 **Representative, Proprietor - Caretech Education Services** is Andrew Sutherland – Operations Director-Education

1790 Services

1791

1792 **Telephone: 07701314378****Email: Andrew.Sutherland@caretech-uk.com**

1793

Local authority

1794

1795 **Milton Keynes Local Authority & Milton Keynes Safeguarding Children’s Board**

1796

1797 **Milton Keynes Local Authority & Milton Keynes Local Safeguarding Adults’ Board**

1798

1799 **Telephone 01908 253169 / 3170**

1800

1801 **Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm**

1802

1803 **Outside of office hours**

1804

1805 **James Valley police - The non-emergency police telephone number is: 101.**

1806

For young people under the age of 18:

1807

1808 **The Local Authority Designated Officer (LADO) is Jo Clifford**

1809

1810 **Telephone 01908 254300 or 07425 333864. Outside of office hours/weekends, the emergency duty team can be**1811 **contacted on: 01908 265545.**

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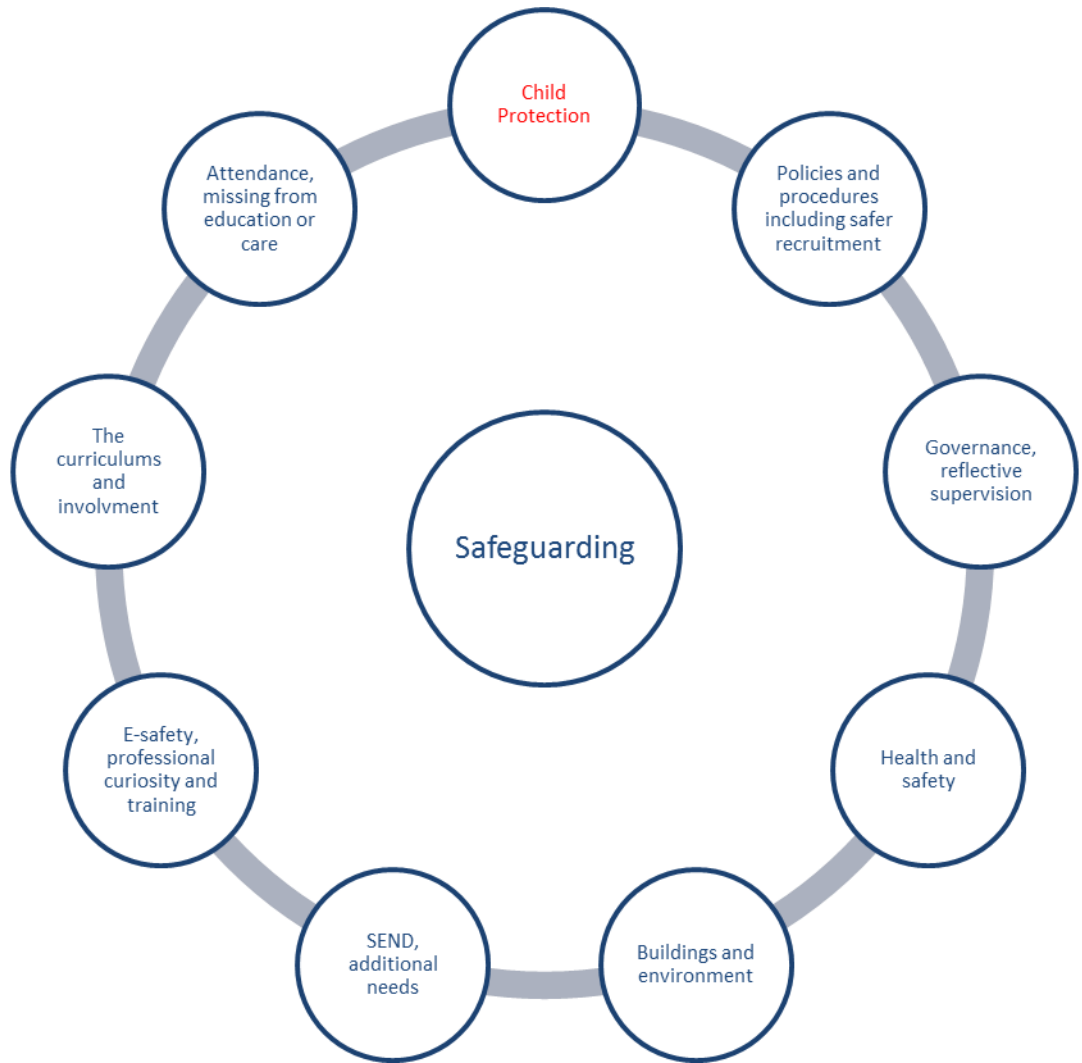
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1818 **Appendix 8. Safeguarding in children’s Services - illustration**

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1843 **Appendix 9. Low – level concerns (Education)**

1844 8.2. As part of their whole school or college approach to safeguarding, schools and colleges should ensure
1845 that they promote an open and transparent culture in which all concerns about all adults working in or
1846 on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with
1847 promptly and appropriately.

1848 8.3. The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern –
1849 no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an
1850 adult working in or on behalf of the school or college may have acted in a way that:

1851 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
1852 and

1853 • does not meet the harm threshold or is otherwise not serious enough to consider a referral to
1854 the LADO.

1855 Examples of such behaviour could include, but are not limited to:

1856 • being over friendly with children

1857 • having favourites

1858 • taking photographs of children on their mobile phone, contrary to school policy

1859 • engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or

1860 • humiliating pupils.

1861 **Sharing Low - level concerns**

1862 8.4. Schools must have their site procedure for sharing low-level concerns which is clear, easy to understand
1863 and implement.

1864 8.5. Whether all low-level concerns are shared initially with the DSL (or other nominated person for example
1865 DSL deputy or with the head teacher/principal is a matter for the school or college to decide. If the former,
1866 then the DSL/DSL Deputy should inform the head teacher/principal of all the low-level concerns and in a
1867 timely fashion according to the nature of each particular low-level concern. **The head teacher/principal**
1868 **should be the ultimate decision maker in respect of all low-level concerns**, although it is recognised that
1869 depending on the nature of some low-level concerns and/or the role of the DSL in some schools/colleges,
1870 the head teacher/principal may wish to consult with the DSL and take a more collaborative decision-
1871 making approach. Some schools’ or college’s Head teacher/Principal is also the DSL in which case all low
1872 – level concerns should be reported to them or other nominated person for example DSL Deputy).

1873 8.6. Low-level concerns which are shared about supply staff and contractors should be notified to their
1874 employers, so that any potential patterns of inappropriate behaviour can be identified.

1875 8.7. If schools and colleges are in any doubt as to whether the information which has been shared about a
1876 member of staff as a low-level concern in fact meets the harm threshold, they should consult with their
1877 LADO.

1878 8.8. Schools and colleges should ensure they create an environment where staff are encouraged and feel
1879 confident to self-refer, where, for example, they have found themselves in a situation which could be
1880 misinterpreted, might appear compromising to others, and/or on reflection they believe they have
1881 behaved in such a way that they consider falls below the expected professional standards.

1882 8.9. Creating a culture in which all concerns about adults (including allegations that do not meet the harms
1883 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is
1884 critical. If implemented correctly, this should encourage an open and transparent culture; enable schools
1885 and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of
1886 abuse; and ensure that adults working in or on behalf of the school or college are clear about professional

1887 boundaries and act within these boundaries, and in accordance with the ethos and values of the
1888 institution.

1889 **Responding to low - level concerns**

1890 8.10. If the concern has been raised via a third party, the head teacher/principal (or a nominated deputy)
1891 should collect as much evidence as possible by speaking:

- 1892 • directly to the person who raised the concern, unless it has been raised anonymously, and
- 1893 • to the individual involved and any witnesses.

1894 8.11. The information collected will help them to categorise the type of behaviour and determine what further
1895 action may need to be taken. This information needs to be recorded in writing along with the rationale
1896 for their decisions and action taken.

1897 **Recording low - level concerns**

1898 8.12. All low-level concerns should be recorded in writing. The Concern/Safeguarding slip in Behaviour Watch
1899 should be completed, as this is the place to record all concerns being raised. The record should include
1900 details of the concern, the context in which the concern arose, and action taken. The name of the
1901 individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then
1902 that should be respected as far as reasonably possible.

1903 8.13. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or
1904 concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or
1905 college should decide on a course of action, either through its disciplinary procedures or where a pattern
1906 of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be
1907 referred to the LADO.

1908 8.14. Consideration should also be given to whether there are wider cultural issues within the school or college
1909 that enabled the behaviour to occur and where appropriate policies could be revised, or extra training
1910 delivered to minimise the risk of it happening again.

1911 8.15. It is for schools and colleges to decide how long they retain such information, but it is recommended that
1912 it is retained at least until the individual leaves their employment.
1913

1914 **Appendix 10. Further Safeguarding information – what everyone needs to know**1915 **Contextual safeguarding**

1916 8.16. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s
1917 experiences of significant harm beyond their families. It recognises that the different relationships that
1918 young people form in their neighbourhoods, schools, colleges, children’s/care homes and online can
1919 feature violence and abuse. Parents and carers have little influence over these contexts, and young
1920 people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore,
1921 children’s social care practitioners need to engage with individuals and sectors who do have influence
1922 over/within extra- familial contexts, and recognise that assessment of, and intervention with, these
1923 spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the
1924 objectives of child protection systems in recognition that young people are vulnerable to abuse in a range
1925 of social contexts.

1926 8.17. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors
1927 outside the school or college and/or can occur between children outside of these environments. All staff,
1928 but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation
1929 in situations outside their families. Extra-familial harms take a variety of different forms and children can
1930 be vulnerable to multiple harms including (but not limited to) sexual exploitation (including harassment
1931 and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse),
1932 criminal exploitation, and serious youth violence, county lines and radicalisation. Further advice is
1933 provided in the [Home Office’s Preventing youth violence and gang involvement](#) and its [Criminal
1934 exploitation of children and vulnerable adults: county lines guidance](#).

1935 8.18. All staff should be aware that technology is a significant component in many safeguarding and wellbeing
1936 issues. Children are at risk of abuse and other risks online as well as face-to-face. In many cases abuse
1937 and other risks will take place concurrently both online and offline. Children can also abuse other children
1938 online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-
1939 consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images
1940 and pornography, to those who do not want to receive such content.

1941 8.19. Children’s social care assessments should consider where children are being harmed in contexts outside
1942 the home (family home, children’s/care home), so it is important that schools, colleges and
1943 children’s/care homes provide as much information as possible as part of the referral process. This will
1944 allow any assessment to consider all the available evidence and enable a contextual approach to address
1945 such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

1946 8.20. We will consider the various factors that have an interplay with the life of any child/young person about
1947 whom we have concerns within the setting and the level of influence that these factors have on their
1948 ability to be protected and remain free from harm particularly when it comes to child exploitation or
1949 criminal activity.

1950 8.21. Whilst this term applies to this specific definition, the notion of considering a child/young person within
1951 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the
1952 school, college, children’s/care home gates, within their family home when they visit (children attending
1953 residential education), within the family (day students) and within the community (extracurricular off site
1954 activities, events, groups and clubs) are key considerations when the DSL is looking at any concerns.

1955 **Bullying**

1956 8.22. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure** acknowledges
1957 that to allow or condone bullying may lead to consideration under child protection procedures. Bullying
1958 is a safeguarding matter that if left unresolved can become a child protection matter. Our settings take
1959 seriously any bullying concerns and both investigate and act to protect Individuals where appropriate.

1960 **Child on child/young adults on young adult/ between children of different age’s abuse**

1961 8.23. All staff should be aware that children can abuse other children/young adults can abuse other young
1962 adults and that the abuse can also take place between individuals of different age and that it can happen
1963 both inside and outside of school/college/children’s/care home and online. It is important that all staff

- 1964 recognise the indicators and signs of the abuse and know how to identify it and respond to reports. In
 1965 some schools, colleges, children’s / care homes site – based or regional members of therapy teams might
 1966 need to be involved and support the SLT to identify the most effective ways of communication with the
 1967 child/young adult who may have potentially been the victim of child on child/young adult on young adult/
 1968 between individuals of different age abuse and who instigated it.
- 1969 8.24. It must be recognised that children and young people would require varied approaches and
 1970 communication mechanisms to be present and available so they can report abuse. Children must be
 1971 regularly reassured that their concern/reports will be treated seriously every time they report it.
- 1972 8.25. Children needs to be told what will happen from the moment their concern is shared, so the lack of
 1973 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.
 1974 Children need to know that that their concerns will be investigated and dealt with. Child’s/young person’s
 1975 preference in terms of how feedback should be provided must be taken into consideration so this can be
 1976 planed for in advance.
- 1977 8.26. The communication with each individual throughout the process of child on child/young adult on young
 1978 adult or between individuals of different age investigation must be regular, proportionate and take place
 1979 using suitable communication.
- 1980 8.27. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn’t
 1981 receive timely and appropriate support from the school/college, hence the communication and support
 1982 must become one of the critical points of a significant priority to those responding to and those managing
 1983 child on child/young adult on young adult/between individuals of different age abuse cases including
 1984 those of a sexual nature. Other consideration for all providers were:
- 1985 • to assume it is happening here and plan accordingly
 - 1986 • work on and strengthen the whole school, college, children’s/care home approach to developing
 1987 a safeguarding culture
 - 1988 • to ensure staff model respectful behaviour
 - 1989 • to ensure children and young people are clear about acceptable and unacceptable behaviour
 - 1990 • to ensure children/young people are confident to ask for help
 - 1991 • to ensure carefully planned and implemented RSHE curriculum
 - 1992 • to ensure the behavioural approach with sanctions & interventions for poor behaviour
 - 1993 • to have mechanisms to support students who need it in the way they need it
 - 1994 • to ensure staff have access to suitable training & that there is clear expectation for staff and
 1995 Managers
 - 1996 • to ensure pupil’s voice in heard and responded to
 - 1997 • to ensure DSLs have some protected time to engage with local safeguarding partners and LADOs,
 1998 so those relationships can be strengthened.
 - 1999 • to ensure staff follow the guidance in Keeping Children Safe in Education
 2000
- 2001 8.28. All staff should understand that even if there are no reports in their schools or colleges it does not mean
 2002 it is not happening, it may be the case that it is just not being reported. As such, it is important if staff

- 2003 have any concerns regarding child on child/young adult on young adult abuse or abuse between
2004 individuals of different age, they should speak to their DSL (or deputy).
- 2005 8.29. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2006 harassment. Staff must NOT take the view that it doesn't not happen in their setting.
- 2007 8.30. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but that
2008 all types of abuse between children of the same, similar of different ages is unacceptable and will be
2009 taken seriously. It is essential that all victims are reassured that they are being taken seriously and that
2010 they will be supported and kept safe.
- 2011 8.31. Abuse between individuals of the same, similar or different age is most likely to include, but may not be
2012 limited to:
- 2013
- 2014 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - 2015 • abuse in intimate personal relationships between peers
 - 2016 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
2017 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - 2018 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2019 element which facilitates, threatens and/or encourages sexual violence). For further information about
2020 sexual violence see [Part 5 of KCSIE 2023 and Annex B](#)
 - 2021 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may
2022 be standalone or part of a broader pattern of abuse; For further information about sexual harassment
2023 see [Part 5 of KCSIE 2023 and Annex B](#)
 - 2024 • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
2025 themselves sexually, or to engage in sexual activity with a third party
 - 2026 • consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as
2027 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance:
2028 [Sharing nudes and semi-nudes advice for education settings.](#)
 - 2029 • Upskirting which typically involves taking a picture under a person's clothing without their permission,
2030 with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim
2031 humiliation, distress or alarm; and
- 2032 8.32. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2033 humiliation used as a way of initiating a person into a group and may also include an online element)
- 2034 8.33. Staff must be clear as to the school's procedures with regards to child on child/young adult on young
2035 adult abuse, abuse between individuals of different age and the important role they have to play in
2036 preventing it and responding where they believe a child may be at risk from it.
- 2037 8.34. All Individuals will be provided with safeguarding information in a format, which is appropriate for their
2038 understanding and communication. This may take the form of posters or a leaflet/booklet.
- 2039 8.35. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
2040 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be
2041 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
2042 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or
2043 acceptable. However, it is critical to state that some children with cognitive impairment may not be able
2044 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will
2045 work with each of the children affected by the situation in order to enhance their understanding of the
2046 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.
- 2047 **Serious violence**
- 2048 8.36. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with
2049 serious violent crime. These may include increased absence from school, a change in friendships or
2050 relationships with older individuals or groups, a significant decline in performance, signs of self-harm or

- 2051 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new
 2052 possessions could also indicate that children have been approached by, or are involved with; individuals
 2053 associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 2054 8.37. All staff should be aware of the range of risk factors which increase the likelihood of involvement in
 2055 serious violence, such as being male, having been frequently absent or permanently excluded from
 2056 school, having experienced child maltreatment and having been involved in offending, such as theft or
 2057 robbery. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and
 2058 gang involvement and its [Preventing youth violence and gang involvement](#).
- 2059 8.38. Sexual violence and sexual harassment can occur between two or more children of any age and sex, from
 2060 primary through to secondary stage and into college. It can occur also through a group of children sexually
 2061 assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment
 2062 exist on a continuum and may overlap; they can occur online and face-to-face (both physically and
 2063 verbally) and are never acceptable. Schools and colleges should be aware of the importance of:
- 2064 • making clear that there is a zero-tolerance approach to sexual violence and sexual harassment
 2065 that it is never acceptable, and it will not be tolerated. It should never be passed off as “banter”,
 2066 “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a
 2067 culture of unacceptable behaviour, an unsafe environment and in worst-case scenarios a culture
 2068 that normalises abuse, leading to children accepting it as normal and not coming forward to
 2069 report it.
 - 2070 • recognising, acknowledging, and understanding the scale of harassment and abuse and that
 2071 even if there are no reports it does not mean it is not happening, it may be the case that it is just
 2072 not being reported.
 - 2073 • challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts
 2074 and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating
 2075 such behaviours risks normalising them.
- 2076 8.39. Sexual violence and sexual harassment between children can occur between two children of **any age and**
 2077 **sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur through
 2078 a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2079 8.40. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful
 2080 and distressing. This will, in all likelihood, adversely affect their educational attainment and will be
 2081 exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same
 2082 children’s/care home. Sexual violence and sexual harassment exist on a continuum and may overlap; they
 2083 can occur online and face to face (both physically and verbally) and are never acceptable. All staff working
 2084 with children are advised to maintain an attitude of ‘it could happen here’.
- 2085 8.41. It is essential that all victims are reassured that they are being taken seriously and that they will be
 2086 supported and kept safe. **A victim should never be given the impression that they are creating a problem**
 2087 **by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed
 2088 for making a report.
- 2089 8.42. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that
 2090 victims are protected, offered appropriate support and every effort is made to ensure their education is
 2091 not disrupted. It is also important that other children, adult students and school and college staff are
 2092 supported and protected as appropriate.
- 2093 8.43. There is support available for schools and colleges. [Part 5 of KCSIE 2023 p110](#) provides detailed
 2094 information and links to resources.
- 2095 8.44. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with
 2096 special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2097 8.45. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm.
 2098 However, children who are LGBT can be targeted by other children. In some cases, a child who is

- 2099 perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children
2100 who identify as LGBT.
- 2101 8.46. Risks can be compounded where children/young people who are LGBT lack a trusted adult with whom
2102 they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and
2103 provide a safe space for them to speak out or share their concerns with members of staff.
- 2104 8.47. LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health](#)
2105 [Education](#) curriculum and there is a range of support available to help schools counter homophobic,
2106 biphobic and transphobic bullying and abuse.
- 2107 8.48. Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to
2108 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is
2109 developmentally inappropriate and may cause developmental damage. An umbrella term for these types
2110 of behaviour are often referred to as “**harmful sexual behaviour**”. The term has been widely adopted in
2111 child protection. Harmful sexual behaviour can occur online and/or offline and can also occur
2112 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection
2113 context.
- 2114 8.49. Situations where children/young people are forced or coerced into sexual activity by peers or associates
2115 can be related with gang / serious youth violence activity but that is not always the case. Peer influence
2116 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many
2117 young people see it as a “way out” from their day-to-day life and feel a strong bond with their peers, one
2118 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying
2119 include:
- 2120 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and
2121 psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or
2122 worthless because of their colour, ethnicity, culture, faith community, national origin or
2123 national status.
 - 2124 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality
2125 or gender is used as a weapon by boys or girls, this may also include any of the following:
 - 2126 - spreading rumors about someone's alleged sex life
 - 2127 - using offensive terms to describe a person
 - 2128 - inappropriate touching or attempts to do so
 - 2129 - non-consensual sharing of sexual images and videos
 - 2130 - unwanted sexual comments and messages, including those on social media
 - 2131 - any sexual exploitation, coercion and threats
 - 2132 - sexual assault and rape
 - 2133 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or
2134 knowledge, with the intention of viewing their genitals or buttocks (with or without
2135 underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
2136 It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism Offences Act,
2137 which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came
2138 into force on 12 April 2019.
 - 2139 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are
2140 transgender, thought to be transgender, or whose gender expression doesn’t conform to

- 2141 traditional gender roles. Transphobia can prevent transgender and gender
2142 nonconforming people from living full lives free from harm.
- 2143 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived
2144 sexual orientation);
- 2145 • **Disablist Bullying** - targets a young person solely based on their disability. This can include
2146 manipulative bullying where a perpetrator forces the victim to act in a certain way, or
2147 exploiting a certain aspect of the victim's disability.
- 2148 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect
2149 attitude (usually negative) towards an individual based solely on the individual's
2150 membership of a social group. For example, a person may hold prejudiced views towards
2151 a certain race or gender etc. (e.g. sexist).
- 2152 • **Discrimination** is the behaviour or actions, usually negative, towards an individual or
2153 group of people, especially on the basis of sex/race/social class.
- 2154 8.50. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE 2023 Part 5: Child](#)
2155 [on child sexual violence and harassment](#)
2156 What staff should do if they have concerns about the child/young person
- 2157 8.51. Staff working with children/young people are advised to maintain an attitude of 'it could happen here'
2158 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff
2159 should always act in the best interests of the child/young person
- 2160 8.52. If staff have any concerns about a child's/young person welfare, they should act on them immediately by
2161 following this procedure and reporting their concern to the DSL/DSL Deputy.
- 2162 **Opportunities to teach safeguarding**
- 2163 8.53. Schools/colleges must ensure that their staff undergo regular updated safeguarding training, including
2164 online safety and for children to be taught about how to keep themselves and others safe, including
2165 online, that safeguarding training for staff, including online safety training, is integrated, aligned and
2166 considered as part of the whole school or college safeguarding approach and wider staff training and
2167 curriculum planning.
- 2168 8.54. It should be recognised that effective education will be tailored to the specific needs and vulnerabilities
2169 of individual children/young people, including those who are victims of abuse, and children/young people
2170 with special educational needs or disabilities.
- 2171 8.55. Whilst considering the above training requirements, governance boards and proprietor should have
2172 regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour
2173 effectively to ensure a good and safe educational environment and requires teachers to have a clear
2174 understanding of the needs of all pupils.
- 2175 8.56. Schools and colleges play a crucial role in preventative education. Preventative education is most
2176 effective in the context of a whole-school or college approach that prepares pupils and students for life
2177 in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia,
2178 biphobic and sexual violence/harassment.
- 2179 8.57. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may
2180 cover relevant issues through tutorials). This may include covering relevant issues for schools through
2181 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary
2182 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found
2183 here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health](#)
2184 [education.](#)
- 2185 8.58. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:
2186 [Teaching about relationships sex and health](#). This includes teacher-training modules on the RSHE topics

2187 and non-statutory implementation guidance. The following resources plus many more listed in [Annex B](#),
2188 may also help schools and colleges understand and teach about safeguarding:

- 2189 • DfE advice for schools: [teaching online safety in schools](#);
- 2190 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
- 2191 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with](#)
2192 [children and young people](#);
- 2193 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum
2194 impact of any online safety sessions delivered by external visitors;
- 2195 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2196 • LGFL '[Undressed](#)' provided schools advice about how to teach young children about being
2197 tricked into getting undressed online in a fun way without scaring them or explaining the
2198 motives of sex offenders.
- 2199 • Public Health England: [Every Mind Matters](#)
- 2200 • [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any
2201 online challenges and hoaxes, sharing information with parents and carers and where to
2202 get help and support.

2203 8.59. Whilst it is essential that governance boards and proprietor ensure that appropriate filters and
2204 monitoring systems are in place, they should be careful that “over blocking” does not lead to
2205 unreasonable restrictions as to what children can be taught with regard to online teaching and
2206 safeguarding

2207 8.60. As schools and colleges increasingly work online, it is essential that children are safeguarded from
2208 potentially harmful and inappropriate online material. Whilst it is essential that governance boards and
2209 proprietor ensure that appropriate filters and monitoring systems are in place, they should be careful
2210 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with
2211 regard to online teaching and safeguarding

2212 **Online safety**

2213 8.61. It is essential that children are safeguarded from potentially harmful and inappropriate online material.
2214 An effective whole school and college approach to online safety empowers a school or college to protect
2215 and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,
2216 intervene in, and escalate any concerns where appropriate.

2217 8.62. The breadth of issues classified within online safety is considerable, but can be categorised into four areas
2218 of risk which we'll refer to as 4Cs later on:

- 2219 • **content:** being exposed to illegal, inappropriate or harmful content, for example:
2220 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation
2221 and extremism.
- 2222 • **contact:** being subjected to harmful online interaction with other users; for example: peer
2223 to peer pressure, commercial advertising and adults posing as children or young adults with
2224 the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2225 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for
2226 example, making, sending and receiving explicit images (e.g. consensual and non-

2227 consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit
2228 images and online bullying; and

2229 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or
2230 financial scams. If you feel your pupils, students or staff are at risk, please report it to the
2231 Anti-Phishing Working Group <https://apwg.org/>

2232 8.63. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and
2233 implementing policies and procedures. This will include considering how online safety is reflected as
2234 required in all relevant policies and considering online safety whilst planning the curriculum, any teacher
2235 training, the role and responsibilities of the DSL and any parental engagement.

2236 **Online safety policy**

2237 8.64. Online safety and the school or college’s approach to it should be reflected in the child protection policy.
2238 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college
2239 should have a clear policy on the use of mobile and smart technology. Amongst other things this will
2240 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone
2241 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually
2242 harass their peers via their mobile and smart technology, share indecent images: consensually and non-
2243 consensually (often via large chat groups), and view and share pornography and other harmful content.
2244 Schools and colleges should carefully consider how this is managed on their premises and reflect in their
2245 mobile and smart technology policy and their child protection policy.

2246 8.65. Information and support available to schools and colleges to keep children safe online can be found in
2247 [Part 2 and Annex B of KCSIE 2023](#).

2248 **Remote Learning**

2249 8.66. The DfE has provided advice to support schools and colleges to help keep pupils, students and staff safe
2250 whilst learning remotely, [safeguarding in schools colleges and other providers](#) and [safeguarding and](#)
2251 [remote education](#). The NSPCC also provide helpful advice - [Undertaking remote teaching safely](#). NSPCC
2252 Learning - [Undertaking remote teaching safely during school closures](#).

2253 8.67. Schools and colleges are likely to be in regular contact with parents and carers. Those communications
2254 should be used to reinforce the importance of children being safe online and parents and carers are likely
2255 to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It
2256 will be especially important for parents and carers to be aware of what their children are being asked to
2257 do online, including the sites they will asked to access and be clear who from the school or college (if
2258 anyone) their child is going to be interacting with online

2259 **Filters and monitoring**

2260 8.68. Whilst considering their responsibility to safeguard and promote the welfare of children and provide
2261 them with a safe environment in which to learn, governance boards and proprietor should be doing all
2262 that they reasonably can to limit children’s exposure to the above risks from the school’s or college’s IT
2263 system. As part of this process, governance boards and proprietor should ensure their school or college
2264 has appropriate filters and monitoring systems in place. Governance boards and proprietor should
2265 consider the age range of their children, the number of children, how often they access the IT system and
2266 the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and
2267 seek advice and support required.

2268 8.69. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges
2269 and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK Safer Internet

2270 Centre has published guidance as to what “appropriate” filtering and monitoring might look like UK Safer
2271 Internet Centre: [appropriate filtering and monitoring](#).

2272 **Information security and access management**

2273 8.70. Education settings are directly responsible for ensuring they have the appropriate level of security
2274 protection procedures in place, in order to safeguard their systems, staff and learners and review the
2275 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
2276 Guidance on e-security is available from the National Education Network. In addition, broader guidance
2277 on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.

2278 **Reviewing online safety**

2279 8.71. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should
2280 consider carrying out an annual review of their approach to online safety, supported by an annual risk
2281 assessment that considers and reflects the risks their children face. A free online safety self-review tool
2282 for schools can be found via the [360 safe website](#).

2283 8.72. UKCIS has published [online safety in schools and colleges: Questions from the governing board](#). The
2284 questions can be used to gain a basic understanding of the current approach to keeping children safe
2285 online; learn how to improve this approach where appropriate; and find out about tools, which can be
2286 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of
2287 trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development
2288 and monitoring.

2289 **Cyberbullying**

2290 8.73. Central to Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all
2291 children/young people have a right not to be bullied’. School also recognises that it must take note of
2292 bullying perpetrated outside school which spills over into the school; therefore once aware services will

2293 respond to any cyber-bullying we become aware of carried out by children/young people when they are
2294 away from the site.

2295 8.74. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using
2296 electronic forms of contact repeatedly over time against a victim who cannot easily defend
2297 himself/herself.’

2298 • By cyber-bullying, we mean bullying by electronic media:

2299 • Bullying by texts or messages or calls on mobile ‘phones

2300 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2301 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,
2302 personal websites, social networking sites

2303 • Using e-mail to message others

2304 • Hijacking/cloning e-mail accounts

2305 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2306 8.75. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory
2307 information in any media including internet sites.

2308 8.76. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public
2309 electronic communications network, a message or other matter that is grossly offensive or one of an
2310 indecent, obscene or menacing character.

2311 8.77. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct
2312 amounting to harassment.

2313 8.78. If services become aware of any incidents of cyberbullying, they will need to consider each case
2314 individually as to any criminal act that may have been committed. The services will pass on information
2315 to the police if it feels that it is appropriate or is required to do so.

2316 **Gaming – raising awareness**

2317 8.79. Online gaming is an activity in which the majority of children and young people and many adults get
2318 involved. The services will raise awareness by talking to children/young people/key workers/staff and
2319 also where appropriate parents/carers involved about the games their children play and help them
2320 identify whether they are appropriate.

2321 **Nudes/semi nudes’ images or videos**

2322 8.80. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others,
2323 or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops -
2324 any device that enables the sharing of media and messages. Sexting may also be called: trading nudes,
2325 dirties, pic for pic.

2326 8.81. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the
2327 person doing it is a child. A young person is breaking the law if they:

2328 • take an explicit photo or video of themselves or a friend

2329 • share an explicit image or video of a child, even if it’s shared between children of the same age

2330 • possess, download or store an explicit image or video of a child, even if the child gave their permission
2331 for it to be created.

2332 8.82. However, if a young person is found creating or sharing images, the police can choose to record that a
2333 crime has been committed but that taking formal action isn't in the public interest. There are many

2334 reasons why a young person may want to send a naked or semi-naked picture, video or message to
2335 someone else:

- 2336 • joining in because they think that ‘everyone is doing it’
- 2337 • boosting their self-esteem
- 2338 • flirting with others and testing their sexual identity
- 2339 • exploring their sexual feelings
- 2340 • to get attention and connect with new people on social media
- 2341 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person
2342 asking is persistent

2343 8.83. The risks of sexting are that the young person has no control over the images and how these are shared,
2344 and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide
2345 education and guidance to prevent individuals from becoming victims of such situations by encouraging
2346 them to think about the risk of sexting and understand how to seek help when approached to take part
2347 in sexting. More information can be found on [Keeping-children-safe/online-safety/sexting-sending-
2348 nudes](#).

2349 **Online reputation**

2350 8.84. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed
2351 by posts, photos that have been uploaded and comments made by others on people’s profiles. It is
2352 important that children/young people and staff are aware that anything that is posted could influence
2353 their future professional reputation. The majority of organisations and work establishments now check
2354 digital footprint before considering applications for positions or places on courses.

2355 **Grooming**

2356 8.85. On-line grooming is the process by which one person with an inappropriate sexual interest in
2357 children/young people will approach a child/young person on-line, with the intention of developing a

2358 relationship with that child/young person, to be able to meet them in person and intentionally cause
2359 harm.

2360 8.86. The services will build awareness amongst children/young people, parents/carers and staff about
2361 ensuring that the child/young person:

2362 • Only has friends on-line that they know in real life

2363 • Is aware that if they communicate with somebody that they have met on-line, that relationship should
2364 stay on-line.

2365 8.87. Where appropriate that the services will support parents/carers to:

2366 • Recognise the signs of grooming

2367 • Have regular conversations with their children/young people about on-line activity and how to stay
2368 safe on-line

2369 8.88. Where appropriate the services will raise awareness by:

2370 • Regular communication with the families

2371 • Schools/colleges will include awareness around grooming as part of their curriculum

2372 • Identifying with the families and children/young people how they can be safeguarded against
2373 grooming.

2374 **Violence against women and girls (VAWG)**

2375 8.89. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women
2376 and girls. The government has a strategy looking at specific issues that women and girls face.

2377 8.90. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to
2378 equal participation of women and men in social, economic, and political spheres. Such violence impedes
2379 gender equality and the achievement of a range of development outcomes. VAWG is a complex and
2380 multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention
2381 of and response to such violence require coordinated action across multiple sectors.
2382

2383 **Female genital mutilation (FGM)**

2384 8.91. FGM comprises all procedures involving partial or total removal of the external female genitalia or other
2385 injury to the female genital organs for non-medical reasons, hence interferes with the natural function of
2386 girls and women's bodies. It has no health benefits and harms girls and women in many ways.

2387 8.92. The age at which girls undergo FGM varies enormously according to the community in which they live.
2388 The procedure may be carried out when the girl is new born, during childhood or adolescence, just before
2389 marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place
2390 between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

2391 8.93. In 2003, FGM became a criminal offence for UK nationals or permanent UK residents to take their child
2392 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty
2393 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2394 **Forced marriage**

2395 8.94. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses
2396 cannot consent to the marriage and duress is involved. Duress can include physical, psychological,

2397 financial, sexual and emotional pressure.’ In developing countries, approx. 11% of girls are married before
2398 the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2399 8.95. It is important that all members of staff recognise the presenting symptoms, know how to respond if
2400 there are concerns and where to turn for advice.

2401 8.96. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**
2402 and locally through the local police safeguarding team or children’s social care.

2403 8.97. While all members of staff (education, care, clinical) have important responsibilities with regard to
2404 children, young people or adults who may be at risk of forced marriage, managers and leaders should not
2405 undertake roles in this regard that are most appropriately discharged by other children’s services
2406 professionals such as police officers or social workers.

2407 8.98. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced
2408 marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory
2409 guidance for dealing with forced marriage, which can both be found at [The Right to Choose: Multi-agency
2410 statutory guidance for dealing with forced marriage](#). School staff can contact the Forced Marriage Unit if
2411 they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

2412 **Breast ironing**

2413 8.99. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's
2414 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically
2415 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and
2416 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue
2417 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where
2418 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports
2419 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used
2420 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2421 8.100. Any suspected cases of breast ironing MUST be reported immediately under this Child Protection and
2422 Safeguarding policy and the Individual offered medical help.

2423 **Teenage relationship abuse**

2424 8.101. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such as
2425 controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them
2426 what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen
2427 relationships.

2428 8.102. Further research shows that teenagers don’t understand what consent means within their relationships.
2429 They often hold the common misconception that rape can only be committed by a stranger down a dark
2430 alley and don’t understand that it could happen within their own relationships. This can lead to these
2431 abusive behaviours feeling ‘normal’ and therefore unchallenged, as they are not recognised as being
2432 ‘abusive’.

2433 8.103. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their
2434 own, their peers or others behaviour towards them. Therefore, significant effort will be made to raise
2435 awareness of it and respond effectively to such situations.

2436 8.104. In response to this Cambian Group will provide education and guidance to prevent teenagers from
2437 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of
2438 violence, abuse and controlling behaviours, and understand what consent means within relationships.

2439 **Honour-based violence**

2440 8.105. It is often linked to family members or acquaintances who mistakenly believe someone has brought
2441 shame to their family or community by doing something that is not in keeping with the traditional beliefs
2442 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider
2443 network of family or community pressure and can include multiple perpetrators. It is important to be

2444 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take”
2445 for example, honour-based violence might be committed against individuals who:

2446 • become involved with a boyfriend or girlfriend from a different culture or religion

2447 • want to get out of an arranged marriage

2448 • want to get out of a forced marriage

2449 • wear clothes or take part in activities that might not be considered traditional within a particular
2450 culture.

2451 8.106. Girls and women are the most common victims of honour-based violence however; it can also affect men
2452 and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’
2453 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced
2454 marriage, being held against their will or taken somewhere they don’t want to go.

2455 8.107. If staff believe that the Individual is at risk from honour-based violence, the DSL will follow the usual
2456 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is
2457 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
2458 teachers. It is important that if honour-based violence is known or suspected, communities and family
2459 members must NOT be contacted prior to referral to the police or social care as this could increase the
2460 risk to the individual.

2461 Preventing extremism and radicalisation

2462 8.108. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism
2463 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**
2464 **Extremism and Radicalisation policy** and **0.27 E-safety policy**, we all need to be vigilant in ensuring the
2465 safety from extremist and terrorist material when accessing the internet. We consider Milton Keynes
2466 Local Authority Safeguarding Children’s Board arrangements to fulfil its Prevent duties.

2467 8.109. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other
2468 forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges’
2469 safeguarding approach.

2470 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the
2471 rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
2472 This also includes calling for the death of members of the armed forces.

2473 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist
2474 ideologies associated with terrorist groups.

2475 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes
2476 serious damage to property; or seriously interferes or disrupts an electronic system. The use or
2477 threat **must** be designed to influence the government or to intimidate the public and is made
2478 for the purpose of advancing a political, religious or ideological cause.

2479 8.110. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
2480 Background factors combined with specific influences such as family and friends may contribute to a
2481 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social
2482 media or the internet) and settings (such as within the home).

2483 8.111. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
2484 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to
2485 changes in children’s behaviour, which could indicate that they may be in need of help or protection.

2486 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2487 proportionately which may include making a Prevent referral.

2488 8.112. The school's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent
2489 referral

2490 8.113. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act
2491 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent
2492 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2493 8.114. [An online general awareness-training module on Channel is available](#). The module is suitable for school
2494 staff and other front-line workers. It introduces the topics covered by this advice, including how to
2495 identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types
2496 of intervention that may be appropriate, in addition to Channel.

2497 **Prevent Duty**

2498 8.115. The Prevent duty should be seen as part of schools and colleges' wider safeguarding obligations. DSLs
2499 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance
2500 for England & Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also
2501 covers childcare). DSLs and other senior leaders in colleges should familiar themselves with the [Prevent
2502 duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms
2503 of four general themes: risk assessment, working in partnership, staff training, and IT policies.

2504 8.116. Local authorities will be expected to ensure appropriate frontline staff, including those of its contractors,
2505 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism
2506 and are aware of available programmes to deal with this issue.

2507 8.117. As the independent body responsible for standards and quality improvement for further education, the
2508 Education and Training Foundation will work with the sector to ensure that appropriate training is
2509 available. This will include and draw from training provided through the network of Prevent co-
2510 ordinators.

2511 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2512 8.118. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2513 8.119. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an
2514 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity,
2515 in exchange for something the victim needs or wants, and/or for the financial advantage or increased
2516 status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can
2517 affect children, both male and female and can include children who have been moved (commonly
2518 referred to as trafficking) for the purpose of exploitation.

2519 **Child Criminal Exploitation (CCE)**

2520 8.120. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or
2521 money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be
2522 forced or manipulated into committing vehicle crime or threatening/committing serious violence to
2523 others. Children can become trapped by this type of exploitation as perpetrators can threaten victims
2524 (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying
2525 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As
2526 children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims
2527 is not always recognised by adults and professionals, (particularly older children), and they are not
2528 treated as victims despite the harm they have experienced. They may still have been criminally exploited
2529 even if the activity appears to be something they have agreed or consented to.

2530 8.121. It is important to note that the experience of girls who are criminally exploited can be very different to
2531 that of boys. The indicators may not be the same; however, professionals should be aware that girls are

2532 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally
2533 exploited may be at higher risk of sexual exploitation.

2534 **Child Sexual Exploitation (CSE)**

2535 8.122. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by
2536 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing,
2537 and touching outside clothing. It may include noncontact activities, such as involving children in the
2538 production of sexual images, forcing children to look at sexual images or watch sexual activities,
2539 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for
2540 abuse including via the internet.

2541 8.123. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate
2542 knowledge e.g. through others sharing videos or images of them on social media.

2543 8.124. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17
2544 year olds who can legally consent to have sex. Some children may not realise they are being exploited
2545 e.g. they believe they are in a genuine romantic relationship.

2546 8.125. Children with learning difficulties can be particularly vulnerable to exploitation as can children from
2547 particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual
2548 emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who
2549 go missing from home or school, children involved in crime, children with parents/carers who have
2550 mental health problems, learning difficulties/other issues, children who associate with other children
2551 involved in exploitation. However, it is important to recognise that any child can be targeted.

2552 8.126. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors
2553 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or
2554 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants
2555 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or
2556 facilitator.

2557 8.127. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of
2558 18 years, including 16- and 17-year olds who can legally consent to have sex) or adults. It is critical to
2559 know that children/young people may also be exploited by other children/young people, who themselves
2560 may be experiencing exploitation – where this is the case, it is important that the child/young person
2561 perpetrator is also recognised as a victim.

2562 8.128. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic
2563 to complex organised abuse. It can involve force and/or enticement-based methods of compliance and
2564 may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when
2565 activity appears consensual and it should be noted exploitation as well as being physical can be facilitated

2566 and/or take place online. More information include definitions and indicators are included in [KCSIE 2023-](#)
2567 Some of the following can be indicators of both child criminal and sexual exploitation where children:

- 2568 • appear with unexplained gifts or new professions;
- 2569 • associate with other young people involved in exploitation;
- 2570 • suffer from changes in emotional well-being;
- 2571 • misuse drugs and alcohol;
- 2572 • go missing for periods of time or regularly or come home late; and
- 2573 • regularly miss school or education or do not take part in education.

2574 8.129. Some additional specific indicators that may be present in CSE and children who:

- 2575 • Children who have older boyfriends or girlfriends; and
- 2576 • Children who suffer from sexually transmitted infections, display sexual behaviours
2577 beyond expected sexual development or become pregnant.

2578 8.130. Further information on signs of a child’s involvement in sexual exploitation is available in Home Office
2579 guidance: Child sexual exploitation: guide for practitioners.

2580 8.131. As an organisation we do recognise that the same level of exploitation may take place involving
2581 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18
2582 years or over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act
2583 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that
2584 the above statement will equally apply to those who are 18+ across England and Wales.

2585 8.132. Children under the age of criminal responsibility (under the age of 10), or young people who have
2586 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal
2587 activity provide opportunity for criminals to distance themselves from crime.

County Lines

2588
2589 8.133. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal
2590 drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as
2591 well as across the UK - no specified distance of travel is required. Children and vulnerable adults are
2592 exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation,
2593 violence (including sexual violence) and weapons to ensure compliance of victims. Children can be
2594 targeted and recruited. Exploitation is an integral part of the county lines, children may become victims
2595 through: coercion, intimidation, violence (including sexual) and weapons.

2596 8.134. Children can be targeted and recruited into county lines in a number of locations including schools,
2597 further and higher educational institutions, pupil referral units, special educational needs schools,
2598 children’s homes and care homes. Children are often recruited to move drugs and money between
2599 locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed
2600 internally to avoid detection. Children can easily become trapped by this type of exploitation as county
2601 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their
2602 families) if they attempt to leave the county lines network.

2603 8.135. Children are also increasingly being targeted and recruited online using social media. Children can easily
2604 become trapped by this type of exploitation as county lines gangs can manufacture drug debts which
2605 need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they
2606 attempt to leave the county lines network. These children and young people are at serious risk of
2607 criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not

2608 necessarily be affiliated to a gang, but who have developed networks across geographical boundaries to
2609 access and exploit existing drugs markets in these areas.

2610 8.136. The group, or individuals exploited by them, travel regularly between the urban hub and the rural
2611 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply
2612 but is generally more frequent and in smaller deal amounts compared to most other drug supply
2613 methods.

2614 8.137. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are
2615 involved in county lines. Some additional specific indicators that may be present where a child is
2616 criminally exploited through involvement in county lines are children who:

- 2617 • go missing and are subsequently found in areas away from their home;
- 2618 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2619 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and
2620 collecting money for drugs;
- 2621 • are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid
2622 detection;
- 2623 • are found in accommodation that they have no connection with, often called a ‘trap house or
2624 cuckooing’ or hotel room where there is drug activity;
- 2625 • owe a ‘debt bond’ to their exploiters;
- 2626 • have their bank accounts used to facilitate drug dealing.

2627 8.138. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be
2628 considered alongside consideration of availability of local services/third sector providers who offer
2629 support to victims of county lines exploitation.

2630 8.139. Further information on the signs of a child’s involvement in county lines is available in guidance published
2631 by the [Home Office and The Children’s Society County Lines Toolkit for Professional](#).

2632 **Cuckooing**

2633 8.140. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation
2634 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to
2635 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to as
2636 cuckooing.

2637 8.141. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to
2638 use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

2674 question of the causes of knife crime, leaders told Ofsted that, in their experience, children
2675 are in three categories of risk of knife carrying.

2676 8.147. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
2677 criminal exploitation.

2678 8.148. Underneath this lies a group of children who have witnessed other children carrying knives, have been
2679 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or
2680 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on
2681 social media.

2682 8.149. Then there are children who carry knives to school as an isolated incident. For example, they may carry
2683 a penknife that a grandparent has gifted them

2684 8.150. It is important to remember that knife crime does not exist in a vacuum and children who are victims or
2685 perpetrators may also be experiencing multiple vulnerabilities.

2686 8.151. Some children and young people can be more at risk of being drawn into criminality; multiple studies
2687 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
2688 both understand and address individual risk factors as well as address the social challenges that underpin
2689 criminal exploitation and serious violence in our communities, from poor mental health, addiction,
2690 poverty, unemployment and poor-quality housing.

2691 **Missing young people and the link between missing and county lines**

2692 8.152. Every precaution is taken through the use of risk assessments and thorough planning and supervision to
2693 ensure that children, young people and young adults are safe both at school, college, home, and on
2694 outings. If a child, young person or young adult goes missing from our Location, it is considered a potential
2695 indicator of abuse or neglect.

2696 8.153. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of
2697 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to attend
2698 school regularly or has been absent without the school's permission for a continuous period of 10 days
2699 or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs
2700 such as travelling to conflict zones, FGM and forced marriage.

2701 8.154. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
2702 towards going missing and becoming involved in criminal activities. Some individuals may be pulled
2703 towards exploitation through the promise of money, gifts, affection and status. However, they may be
2704 then be forced to work for these people as they are coerced into believing that they are indebted to
2705 them.

2706 **Domestic abuse**

2707 8.155. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever
2708 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as
2709 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of
2710 domestic abuse, based on the previous cross-government definition, ensures that different types of
2711 relationships are captured, including ex-partners and family members. The definition captures a range of
2712 different abusive behaviours, including physical, emotional and economic abuse and coercive and
2713 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the
2714 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as
2715 defined in section 2 of the 2021 Act).

2716 8.156. Types of domestic abuse include intimate partner violence, abuse by family members, teenage
2717 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of

- 2718 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and
2719 domestic abuse can take place inside or outside of the home.
- 2720 8.157. All children can witness and be adversely affected by domestic abuse in the context of their home life
2721 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence
2722 can have a serious, long lasting emotional and psychological impact on children. In some cases, a child
2723 may blame themselves for the abuse or may have had to leave the family home as a result.
- 2724 8.158. Young people can also experience domestic abuse within their own intimate relationships. This form of
2725 abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young
2726 people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or
2727 both parties are under 16). However, as with any child under 18, where there are concerns about safety
2728 or welfare, child safeguarding procedures should be followed and both young victims and young
2729 perpetrators should be offered support.
- 2730 8.159. KCSIE2022 introduces additional information about domestic abuse which can encompass a wide range
2731 of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited
2732 to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They
2733 may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own
2734 intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term
2735 impact on their health, well-being, development, and ability to learn.
- 2736 8.160. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work
2737 together to provide emotional and practical help to children. The system ensures that when police are
2738 called to an incident of domestic abuse, where there are children in the household who have experienced
2739 the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or
2740 children arrive at school the following day. This ensures that the school has up to date relevant
2741 information about the child’s circumstances and can enable immediate support to be put in place,
2742 according to the child’s needs. Operation Encompass does not replace statutory safeguarding
2743 procedures. Where appropriate, the police and/or schools should make a referral to children’s social care
2744 if they are concerned about a child’s welfare. More information about the scheme and how schools can
2745 become involved is available on the Operation Encompass website.
- 2746 8.161. Operation Encompass provides an advice and helpline service for all staff members from educational
2747 settings who may be concerned about children who have experienced domestic abuse. The helpline is
2748 available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).
- 2749 8.162. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence,
2750 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well
2751 as those who are worried about friends and loved ones. It also has a form through which a safe time from

2752 the team for a call can be booked. Additional advice on identifying children who are affected by domestic
2753 abuse and how they can be helped is available at:

- 2754 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 2755 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 2756 • [SafLives: young people and domestic abuse.](#)
- 2757 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes
2758 information for adult victims, young people facing abuse in their own relationships and
2759 parents experiencing child to parent violence/abuse)
- 2760 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic
2761 abuse on children)

2762 **Serious Violent Crime**

2763 8.163. All staff should be aware of indicators, which may signal that children are at risk from, or are involved
2764 with serious violent crime. These may include:

- 2765 • increased absence from school with a significant decline in performance,
- 2766 • a change in friendships or relationships with older individuals or group,
- 2767 • signs of self-harm or a significant change in well-being, or signs of assault or
2768 unexplained injuries,
- 2769 • unexplained gifts or new possessions could also indicate that children have been
2770 approached by, or are involved with individuals associated with criminal networks or
2771 gangs.

2772 8.164. All staff should be aware of the associated risks and understand the measures in place to measure these.
2773 Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and gang
2774 involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance -
2775 September 2018.](#)

2776 **Mental Health**

2777 8.165. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing
2778 of young people. All staff should be aware that mental health problems can, in some cases, be an indicator
2779 that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

2780 8.166. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying
2781 possible mental health problems, including routes to escalate and clear referral and accountability
2782 systems.

2783 8.167. The Department is providing funding to support costs of a significant training program for senior mental
2784 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be
2785 available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school
2786 or college approach to mental health.

2787 8.168. Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem.
2788 Staff however, are well placed to observe children day-to-day and identify those whose behaviour
2789 suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff
2790 suspect this might be the case they should report their concerns to a senior leader within the school and
2791 if possible bring their concerns to a member of the clinical team.

2792 8.169. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood
2793 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is

- 2794 key that staff receive appropriate education and training so that they are aware of how these children's
2795 experiences, can impact on their mental health, behaviour and education.
- 2796 8.170. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action
2797 should be taken. Staff should follow their child protection policy and speak immediately to the DSL or a
2798 deputy.
- 2799 8.171. Schools and colleges can access a range of advice to help them identify children in need of extra mental
2800 health support; this includes working with external agencies. More information can be found in the
2801 [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best
2802 practice. Public Health England has produced a range of resources to support secondary school teachers
2803 to promote positive health, wellbeing and resilience among children.
- 2804 8.172. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful
2805 for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools
2806 and colleges can help prevent mental health problems by promoting resilience as part of an integrated,
2807 whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their
2808 pupils.
- 2809 8.173. In addition, Public Health England has produced a range of resources to support secondary schools to
2810 promote positive health, wellbeing and resilience among children including its guidance Promoting
2811 children and young people's emotional health and wellbeing. Its resources include social media, forming
2812 positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The
2813 Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff
2814 with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our

2815 [Wellbeing for education recovery program](#) content, which covers issues such as bereavement, loss,
2816 anxiety, stress and trauma.

2817 **Human trafficking**

2818 8.174. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process
2819 that is a combination of:

- 2820 - Movement (including within the UK);
- 2821 - Control, through harm / threat of harm or fraud
- 2822 - For the purpose of exploitation

2823 8.175. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming
2824 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a
2825 life of abuse, servitude and inhumane treatment.

2826 8.176. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is
2827 significant evidence that children/young people/young adults (both of UK and other citizenship) are being
2828 trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

2829 8.177. There are a number of indicators which suggest that a child/young person/young adult may have been
2830 trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as
2831 follows:

- 2832 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted
2833 infection or has an unwanted pregnancy
- 2834 - Has a history with missing links and unexplained moves
- 2835 - Is required to earn a minimum amount of money every day
- 2836 - Works in various locations
- 2837 - Has limited freedom of movement
- 2838 - Appears to be missing for periods
- 2839 - Is known to beg for money
- 2840 - Is being cared for by adult/s who are not their parents and the quality of the
2841 relationship between the child and their adult carers is not good
- 2842 - Is one among a number of unrelated children found at one address
- 2843 - Has not been registered with or attended a GP practice
- 2844 - Is excessively afraid of being deported.

2845 8.178. For those children/young people/young adults who are internally trafficked within the UK indicators
2846 include:

- 2847 - Physical symptoms (bruising indicating either physical or sexual assault)
- 2848 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 2849 - Reports from reliable sources suggesting the likelihood of involvement in
- 2850 - Sexual exploitation / the child has been seen in places known to be used for sexual
2851 exploitation
- 2852 - Evidence of drug, alcohol or substance misuse

- 2853 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or
- 2854 borrowing clothing from older people
- 2855 - Relationship with a significantly older partner
- 2856 - Accounts of social activities, expensive clothes, mobile phones or other possessions
- 2857 with no plausible explanation of the source of necessary funding
- 2858 - Persistently missing, staying out overnight or returning late with no plausible
- 2859 explanation
- 2860 - Returning after having been missing, looking well cared for despite having not been
- 2861 at home
- 2862 - Having keys to premises other than those known about
- 2863 - Low self- image, low self-esteem, self-harming behaviour including cutting,
- 2864 overdosing, eating disorder, promiscuity
- 2865 - Truancy / disengagement with education
- 2866 - Entering or leaving vehicles driven by unknown adults
- 2867 - Going missing and being found in areas where the child/young person/young adult
- 2868 has no known links; and/or
- 2869 - Possible inappropriate use of the internet and forming on-line relationships,
- 2870 particularly with adults/other adults.

2871 8.179. These behaviours themselves do not indicate that an Individual is being trafficked, but should be

2872 considered as indicators that this may be the case.

2873 **Child abduction and community safety incidents**

2874 8.180. Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal

2875 responsibility for the child. Child abduction can be committed by parents or other family members; by

2876 people known but not related to the victim (such as neighbours, friends and acquaintances); and by

2877 strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst

2878 children and parents, for example, people loitering nearby or unknown adults engaging children in

2879 conversation.

2880 8.181. As children get older and are granted more independence (for example, as they start walking to school

2881 on their own), it is important they are given practical advice on how to keep themselves safe. Many

2882 schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons

2883 focus on building children’s confidence and abilities rather than simply warning them about all strangers.

2884 Further information is available at: <http://www.actionagainstabduction.org/>and

2885 <https://clevernevergoes.org/>

2886 **Modern slavery and the National Referral Mechanism**

2887 8.182. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

2888 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced

2889 criminality and the removal of organs.

2890 8.183. When considering modern slavery, there is a perception that this is taking place overseas. The

2891 government estimates that tens of thousands of slaves are in the UK today.

2892 8.184. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,

2893 vegetables or other foods have all been slaves ‘hiding in plain sight’ within the U.K and rescued from

2894 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been
2895 rescued within the UK.

2896 8.185. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be
2897 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

2898 8.186. Further information on the signs that someone may be a victim of modern slavery, the support available
2899 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
2900 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

2901 **Cybercrime**

2902 8.187. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised
2903 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line)
2904 or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes
2905 include:

- 2906 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer
2907 network to look for test paper answers or change grades awarded;
- 2908 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,
2909 network or website unavailable by overwhelming it with internet traffic from multiple sources;
2910 and
- 2911 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,
2912 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,
2913 including those above.

2914 8.188. Children with particular skill and interest in computing and technology may inadvertently or deliberately
2915 stray into cyber-dependent crime.

2916 8.189. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the
2917 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led
2918 by the National Crime Agency, working with regional and local policing. It aims to intervene where young
2919 people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert
2920 them to a more positive use of their skills and interests.

2921 8.190. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of
2922 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line
2923 bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call](#)
2924 [the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

2925 **Initiation/Hazing**

2926 8.191. Hazing is a form of initiation ceremony, which is used to induct newcomers into an organisation such as
2927 a private school, sports team etc. There are a number of different forms, from relatively mild rituals to
2928 severe and sometimes violent ceremonies in gangs/criminal groups.

2929 8.192. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials, which
2930 promote a bond between them. After the hazing is over, the newcomers also have something in common

2931 with older members of the organisation, because they all experienced it as part of a rite of passage. Many
2932 rituals involve humiliation, embarrassment, abuse, and harassment.

2933 8.193. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour
2934 and raise awareness of such within all services.
2935

2936 **Safeguarding issues relating to Individual children and young people needs**

2937 **Homelessness**

2938 8.194. As an organisation we recognise that being homeless or being at risk of becoming homeless presents a
2939 real risk to a child's/young person welfare. The impact of losing a place of safety and security can affect
2940 an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress
2941 concerns at the earliest opportunity.

2942 8.195. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing
2943 Authority for the parent/guardians in order to raise/progress concerns.

2944 8.196. In most cases school and college, colleagues will be considering homelessness in the context of children
2945 who live with their families, and intervention will be on that basis. However, it should also be recognised
2946 in some cases 16 and 17 year olds could be living independently from their parents or guardians, for
2947 example through their exclusion from the family home, or other reasons. This will require a different level
2948 of intervention and support. Children's services will be the lead agency for these young people and the
2949 DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The
2950 department and the Ministry of Housing, Communities and Local Government have published joint
2951 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless
2952 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

2953 8.197. Guidance on how local authorities should exercise their homelessness functions in accordance with the
2954 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local
2955 authorities](#).

2956 8.198. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young
2957 people and the DSL should ensure appropriate referrals are made based on the Individual's
2958 circumstances.

2959 8.199. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be
2960 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding
2961 Authority where an Individual has been harmed or is at risk of harm.

2962 **Private Fostering**

2963 8.200. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be
2964 cared for by another adult who is not closely related and is not a legal guardian with parental
2965 responsibility for 28 days or more.

2966 8.201. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,
2967 uncle or aunt.

2968 8.202. The Law requires that the carers and parents must notify the Children's Services Department of any
2969 private fostering arrangement.

2970 8.203. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is
2971 being privately fostered they will inform the Children's Services Department and inform both the parents
2972 and carers that they have done so.

2973 **Child and the Court System**

2974 8.204. As an organisation we recognise that children/young people are sometimes required to give evidence in
2975 criminal courts, either for crimes committed against them or for crimes, they have witnessed. We know

2976 that this can be a stressful experience and therefore services across the organisation will aim to support
2977 children through this process.

2978 8.205. Along with information, advice and guidance, services will use age-appropriate materials published by
2979 HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means
2980 to be a witness, how to give evidence and the special measures which are in place to assist such as using
2981 a live link/aids to communicate and video links.

2982 8.206. We recognise that making child arrangements via the family courts following separation can be stressful
2983 and entrench conflict in families. This can be very stressful for children. Services will support
2984 children/young people going through this process.

2985 8.207. Alongside information, advice and guidance services will use online materials published by The Ministry
2986 of Justice (2018) which offers children/young people information & advice on the dispute resolution

2987 service - [Get help with child arrangements](#). These materials will also be offered to parents and carers if
2988 appropriate.

2989 8.208. Ensure that children/young people are sufficiently supported where a parent has been sent to prison;
2990 adequate support includes protection from stigma, isolation and poor mental health.

2991 **Fabricated or induced illnesses (FII)**

2992 8.209. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually
2993 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

2994 8.210. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's
2995 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

2996 8.211. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This
2997 ranges from extreme neglect (failing to seek medical care) to induced illness.

2998 8.212. Behaviours in FII include a parent/carer who:

- 2999
- persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3000
- exaggerates or lies about their child's symptoms,
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- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine
- 3002
- samples to suggest the child has diabetes,
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- deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
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- medication or other substances.
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