

Child Protection and Safeguarding

POLICY AND PROCEDURE

Coleg Pengwern College

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1. Monitoring and review

1.1 Caretech (the Proprietor) will undertake a formal annual review of this policy for the purpose of monitoring and of the efficiency with which the related duties have been discharged, by no later than one year from the date shown below, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

2. Terminology

2.1.

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

‘Establishment’ or ‘Location’	This is a generic term, which means the Children’s Home/school/college.
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Pengwern College we have young people and young adults –residing at and/or attending our college between the ages of 16 to 26.
Head of Service	This is the senior person with overall responsibility for the college. At Pengwern College this is Principal Karen Ford.
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] – North Wales Safeguarding Children’s Boards [NWSB] – Wales
SPOA	Local Authority Designated Officer
DSP/DSP 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 Caretech, agency workers, bank workers, contract workers and volunteers.
Caretech KPI	The online in-house information system, which holds data for each site on quality measures.

3. Definitions and age-related arrangements (alphabetical order)

3.1. Children and Young people are under 18.

3.2. Adults are over the age of 18.

- All Wales safeguarding procedures 2019
- Anti-racist Wales action plan: 2024 update
- Children Act 1989
- Education workforce council main functions regulations 2015
- Independent inquiry into child sexual abuse October 2022
- Independent special post-16 institutions guidance
- Keeping learners safe 2022
- Managing risk of radicalisation in your education setting 2023
- Peer-on-peer sexual harassment among 16 to 18-year-old learners in further education (June 2023)
- Prevent duty guidance: England and Wales (2023)
- Procedures for reporting misconduct and incompetence in the education workforce in Wales (gov.wales) (2015)
- Protection of freedoms act 2012
- Reducing restrictive practices 2022
- Safe and effective intervention- use of reasonable force and searching for weapons (March 2013)
- Safeguarding children in education: handling allegations of abuse against teachers and other staff
- Safeguarding Vulnerable Groups Act 2006
- Safeguarding Wales Procedures
- Safe learning communities 2019 (Work-based learning only)
- Sexual Offences Act 2003
- Social services and wellbeing act 2012
- Social services and well-being (Wales) act 2014
- Working together to safeguard people: Code of Safeguarding Practice



- Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015
 - Supporting learners with healthcare needs (March 2017)
 - The Additional Learning Needs Code for Wales 2021
 - The Regulation and Inspection of Social Care (Wales) Act 2016 Statutory Guidance – Version 3 March 2024
 - Welsh Government Health and Safety Code of Practice for Contracted Provision (June 2018)
- 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the legal framework for social service provision in Wales. It sets out what must and should be done to safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children.
- 3.4. Staff working with young adults aged 18 and over, who receive education, care and support from our children's services division will follow the Adult safeguarding referral process to LSAB/MASH/SPOA/ Regional Safeguarding Children's Boards depending on local arrangements.
- 3.5. This policy addresses children and young people up to the age of 18 and those over the age of 18 who attend a day or residential school or college – this might be 38- or 52-weeks' provision. Some children attending school or college live in children's homes or care homes across England and Wales, hence the reason why this policy and procedure is more comprehensive than that of a traditional day school or college. Our safeguarding responsibility extends beyond day education and often covers 24hrs services regulated by various regulators across the UK.
- 3.6. Where we make references to schools and colleges, this also includes associated children's or care homes in which children/young people live. Where we make references to children's or care homes, those cover all children's/care homes including those within the children's residential care division.

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

- 3.7. Children Social Care - provide support to children in need of help and protection, including children with disabilities. Services include statutory assessment and care planning for children at risk of significant harm, provision for cared for children and care experienced young people, as well as fostering and adoption services.
- 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governance boards and proprietor should ensure that the school or college contributes to multi-agency working in line with statutory guidance

‘Pointers for Practice: Ways in Which Practitioners Can Contribute to Early Help to Address Emerging Safeguarding Concerns’.

- 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority and the chief officer of police for an area (any part of which falls) within the local authority work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- 3.10. It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governance boards, proprietor and their senior leadership teams, especially their DSPs, should make themselves aware of and follow their local arrangements.
- 3.11. The three safeguarding partners should allow all schools and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

Child protection definition

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

Safeguarding definition – Keeping Learners Safe in Education

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

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

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

Safeguarding Adults

3.14. Safeguarding Adults means protecting an adult's right to live in safety, free from abuse and neglect.

It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

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

- Empowerment - presumption of person led decisions and informed consent
 - Prevention - it is better to act before harm occurs
 - Proportionality - proportionate and least intrusive response appropriate to the risk presented
 - Protection - support and representation for those in greatest need
 - Partnerships - local solutions through services working with their communities
 - Accountability - accountability and transparency in delivering safeguarding
- 3.15. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and procedures, which apply to its Adults' Services. Both policies can be accessed via Rezume or Cambianpoint. Services operating in Wales can find their Safeguarding Regional Boards via this hyperlink, which provides access to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

The difference between safeguarding and child protection

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

Abuse and neglect – child and young person context

- 3.17. In the context of a child/young person, abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm. Children/young people may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child/young person or children/young people.
- 3.18. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of these. The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse - children.** The signs that someone could be a victim or an abuser have been explored in **Appendix 6** and

Appendix 7. Parents, carers and other people can harm children and young people by direct acts and/or failure to provide proper care. It should also be understood that children can also be abused by being sexually exploited, or subject to honour-based abuse, domestic violence, forced marriage, female genital mutilation and through online social media. See **Appendix 12 - Further safeguarding information – what everyone needs to know.**

- 3.19. In the context of an adult, abuse is a violation of a person's human and civil rights by another person or persons and may result in significant harm to, or the exploitation of, the person subjected to it.
- 3.20. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children**, there are other forms of abuse in relation to adults explained in more detail in **Appendix 5 – Types of abuse – Adults.**
- 3.21. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a care home, school or in a college. It can happen when someone lives alone or with others. Anyone can carry out abuse or neglect. Abuse can be intentional or unintentional; it may be a single act or repeated acts.

4. Purpose

- 4.1. As an organisation, we have a clear set of guidelines to make sure we deal with child protection and safeguarding concerns effectively.
- 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance**, and it complies with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information Poster**. This policy complies with Denbighshire's locally agreed procedures. Printed or electronic copies of the Local Safeguarding Children's Partnerships (LSCP), Local Safeguarding Adults Board (LSAB) or Regional Safeguarding Children's Boards (Wales) procedures are available in every setting.
- 4.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with the requirements of the local authority in which the establishment is situated.
- 4.4. This policy, and supporting information in various accessible forms, is made available to all Individuals, staff and parents associated with Caretech Pengwern College to ensure that everyone is clear on procedures for ensuring the protection of children and safeguarding children and young adults.
- 4.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11. Staff Code of Practice** and **GHR 37. Code of Conduct**.
- 4.6. In addition, staff should be aware of and have access to the **NSPCC whistleblowing helpline number 0800 028 0285** and the Caretech Whistleblowing service operated by **EthicsPoint** on 0800 086 9128. More information about

EthicsPoint and how it can be contacted can be found in the Whistleblowing policy.

- 4.7. 'When to call the police' has been produced by the National Police Chiefs Council (NPCC) to support school and college staff with when it is appropriate to contact the police.
- 4.8. This NSPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

5. Policy

Safeguarding culture of the organisation

5.1. Caretech safeguarding culture can be best described as:

- **Proactive**, being professionally curious to determine further information in the interests of the child. It is essential that staff exercise professional curiosity at all times, as it is likely that signs of any form of abuse including neglect will be identified when dealing with an un-associated incident. Having strong governance and leadership, raising awareness through and enhancing children's and young people's capacity around the risks and their own safety, regular reflective supervision).
- **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other professionals in timely manner, active listening, applying theory in practice in a methodical way).
- **Reflective** (understanding 'how we got there in the first place', completing a reflective account of events, involving other key professionals in future planning, identifying actions and further changes to be made.

5.2.1 Child Protection and Safeguarding is everyone's responsibility. Everyone working for or visiting our locations has a responsibility to understand and implement this policy and procedure at all times.

- 5.2. All Individuals in our services have a right to feel safe, secure and be protected from harm.
- 5.3. As a provider of specialist education and care services it is imperative that all staff are aware that all Individuals with Special Educational Needs (SEN) and disabilities:
- Are more likely to be abused or neglected;
 - May display behaviour, mood and/or injury, which may relate to possible abuse and not just their SEN or a particular disability.
 - Have a higher risk of peer group isolation.
 - Can be disproportionately impacted by things like bullying without outwardly showing any signs.
 - Experience communication barriers and difficulties in overcoming these barriers.
- 5.4. The most common reason for children or young people being looked after is as a result of abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep children and young people safe.
- 5.5. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care home or in the community, taking into account contextual safeguarding, see **Appendix 12 - Further safeguarding information – what everyone need to know** which also contains information related to safeguarding issues related to individual children and young people's needs.
- 5.6. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding of safeguarding, through both formal curriculum and informal opportunities.
- 5.7. As an organisation, we acknowledge that working in partnership with other agencies protects Individuals and reduces risk and so we will engage in partnership, working throughout the child protection process to safeguard children and will equally work through safeguarding adults' procedures as directed by local procedures.
- 5.8. A comprehensive list of all supporting documentation and related policies, procedures and guidance referred to in this document can be found in separate appendices at the end of this document.

Divisional Safeguarding Board

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

workforce (supply workers/agency/contractor and subcontractors). The full terms of reference for each Board is available on CaretechPoint.

What staff should read and be aware of

- 5.10. It is essential that everybody working in a school or college understands their safeguarding responsibilities. Staff who work directly with children read Keeping Learners Safe guidance. Governance Boards and proprietor (or those acting on their behalf) working with their senior leadership teams and especially their designated safeguarding lead, should ensure that those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one) of this guidance.
- 5.11. The guidance should be read alongside:
- 5.12. statutory guidance – The all wales safeguarding app
- 5.13. The North Wales Safeguarding Partnership advice
- 5.14. departmental advice - What to do if you are Worried a Child is Being Abused - Advice for Practitioners ;
- 5.15. All staff should be aware of systems within their school or college, which support safeguarding, and these should be explained to them as part of staff induction. This should include the:
- Child protection and safeguarding policy
 - Behaviour Support policy
 - Anti bullying policy
 - Whistleblowing policy, Code of conduct and Code of Practice policy
 - Missing from Care policy, local procedure for children missing from education
 - Role of the DSP (including the identity of the DSP and any deputies)
- 5.16. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- 5.17. Schools concerned about a child's/young person's welfare should refer their concern to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process. Children's homes/care homes should follow their referral process as per their local procedure and contact Safeguarding Partner/Safeguarding Board as per their local Safeguarding procedure.
- 5.18. All staff should know what to do if a child/young person/young adult tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DS (or a deputy) and children's social care. Staff should never promise a child that they



would not tell anyone about a report of any form of abuse, as this might ultimately not be in the best interests of the child.

- 5.19. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse including sexual violence and sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- 5.20. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- 5.21. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSP if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 5.22. Staff should not assume a colleague, or another professional will act and share information that might be critical in keeping learners safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).

Whole service approach to Safeguarding

- 5.23. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 5.24. Where there is a safeguarding concern, the child's wishes and feelings must be considered when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

Children with special educational needs and disabilities or physical health issues

- 5.25. Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. There might be some

additional barriers when recognising abuse and neglect in this group of children. These can include:

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

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

Virtual school heads

5.27. Virtual school heads manage pupil premium plus for looked after children. In maintained schools and academies, the designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children. In other schools and colleges, an appropriately trained teacher should take the lead. More information can be found in Designated teacher for looked after and previously looked after children and Promoting the education of looked after and previously looked after children.

6. Procedure

Roles and responsibilities

- 6.1. All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.
- 6.2. Managers at all levels are responsible for ensuring volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware

of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.

- 6.3. The DSP is responsible for handling reports and/or concerns, about the protection of children, young people and adults, appropriately and in accordance with the procedures that underpin this policy.

SLT PRINCIPAL	SLT HEAD OF CARE	SLT HEAD OF EDUCATION
		
Name: Karen Ford Contact: 01745 592300 xt 36103	Name: Nicola Brantley Contact: 01745 592300 xt 36118	Name: Jane Beard Contact: 01745 592300 xt 36131

- 6.4. Our DSPs are Karen Ford, Nicola Brantley and Jane Beard who are senior members of our leadership team. The role of the DSP is to:
- Ensure this child protection and safeguarding policy and local arrangements are known, understood and used appropriately by the staff.
 - Act as a source of support, advice and expertise for all staff; provide support to staff to carry out their safeguarding duties.
 - Act as a point of contact with the Safeguarding Authority.
 - Take lead responsibility for referring and managing safeguarding issues and cases, unless management of a particular case is passed on to a more senior member of the organisation – see section of allegations (those meeting harm threshold) and those which don't meet SPOA criteria).
 - Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs) or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when





deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.

- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child or adult) and where appropriate - Local Authority Designated Officer (SPOA).
- Liaise with the head teacher or principal (if they are not the DSP themselves) to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the statutory guidance - [PACE Code C 2019](#).
- As required, liaise with the "case manager" and the local authority designated officer(s) (SPOA) for child protection concerns in cases which concern a staff member.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- Act as a source of advice, support and expertise within the location when deciding to make a referral by liaising with relevant agencies.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with teachers and school and college leadership staff.
- Identify staff safeguarding training needs and organise training for their staff.
- Participate in local safeguarding boards when required.
- Evaluate and contribute to high standards of safeguarding practice at the location.
- Work to ensure that the wellbeing of children and young people is in constant focus and that they are guarded from harm or abuse.
- Ensure the child protection and safeguarding policy is available publicly and parents/those with parental responsibility are aware of the fact that referrals

about suspected abuse or neglect may be made and the role of the school/college/home in this.

- Understands the relevant data protection legislation and regulations, especially The Data Protection Act 2018.
- 6.5. More details about the role of the DSP including their availability, management of referrals, information sharing, working with others, raising awareness and other can be found in Keeping Learners Safe
- 6.6. Deputy – will act up in the absence of the DSP and compliment their ongoing work where asked do to so. There are arrangements for covering the role of the DSP when Karen Ford, Jane Beard or Nicola Brantley are unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team lead by a DSP with a number of deputies where required. Our Designated Deputies are Anthony Pritchard, Lyndsey Shaw and Alethea Coulston.

Education	Residential	Education
		
Name: Anthony Pritchard	Name: Lyndsey Shaw	Name: Alethea Coulston

- 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected abuse and neglect should be given the highest priority.
- 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and Safeguarding at Cambian**.
- 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff must use the correct forms when recording and managing concerns and allegations regarding the

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

Information sharing and managing the child protection file

- 6.10. The DSP is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Schools and colleges should use the Behaviour Watch/Databridge system - Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs per child/young person as necessary.
- 6.11. Records should include:
- a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome
- 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing and Information sharing advice for safeguarding practitioners. Schools and colleges using Behaviour Watch/Databridge must set up their system Group purposes in line with Behaviour Watch/Databridge guidance. Behaviour Watch/Databridge 'Safeguarding Group' controls who can view and report on Concern/SG slips and 'Not Safeguarding Group' is an opposite Group to restrict who can complete certain sections within the Concern/SG slips.
- 6.13. Where reasonably possible, schools and colleges hold more than one emergency contact number for each pupil or student. This goes beyond the legal minimum. It is good practice to give the school or college additional options to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

7. All Wales child Protection procedures

Recognition and Referral

- 7.1. Suspicion about child abuse may take the form of 'concerns' rather than 'known facts'. Child welfare concerns can arise in many different contexts, including when a child is already known to the social services. Concerns can and should be shared with social services through a referral. While concerns will not necessarily trigger an investigation, they help to build up a picture, along with concerns from other sources, which suggests that a child may be suffering harm. Many local authorities have developed protocols establishing arrangements for conducting initial assessments by local services and defining the circumstances and thresholds under which a child should be referred to social services. In cases of alleged or suspected abuse by a professional or individual employee, the

action should also be guided by the agency's own procedures on professional abuse and whistle blowing.

Making the referral

- 7.2. Referrals should be made to social services as soon as a problem, suspicion or concern about a child becomes apparent, and certainly within 24 hours. Outside office hours, referrals should be made to the social services emergency duty service or the police. Social services and the police must ensure that an appropriate level and deployment of trained staff are available to undertake child protection section 47 enquiries, including out of hours. All telephone referrals or referrals made in person should be confirmed in writing within two working days, preferably using a local standard form where provided. The duty social worker taking the referral should be given as much of the following information as possible by the referrer:

The nature of the concerns;

- 7.3. How and why those concerns have arisen;
- 7.4. The full name, address and date of birth (or age) of the child;
- 7.5. The names, addresses and dates of birth/ages of family members, along with any other names which they use or are known by;
- 7.6. The names and relationship of all those with parental responsibility, where known, should be recorded;
- 7.7. The name, address & date of birth of parent's partner;
- 7.8. The name, address and date of birth of any other adults living in the household;
- 7.9. The names of other professionals involved with the family, including the name of the child's school and GP;
- 7.10. Any information you have on the child's developmental needs and his/her parents or caregivers ability to respond to these needs within the context of the wider family and environment;
- 7.11. Any information affecting the safety of staff.
- 7.12. Individual employees, professionals and independent contractors, should be aware that they cannot remain anonymous when making a referral. However, members of the public may remain anonymous, if they wish to.
- 7.13. The individual employee or professional making the referral may be asked to do some or all of the following tasks, and should be prepared and willing to do them:
- 7.14. Contribute to a strategy discussion or strategy meeting;
- 7.15. Assist in the child protection section 47 enquiries;
- 7.16. Attend the child protection conference;
- 7.17. Provide a written report for the child protection conference;
- 7.18. Contribute to the initial and core assessments.
- 7.19. It is the responsibility of individual employees and professionals to ensure that their child protection concerns are taken seriously and followed through. Each individual employee and professional is accountable for his or her own role in the child protection process, and if an individual employee or professional remains concerned about a child they should re-refer the child and/or bring the matter to the immediate attention of the social services senior manager with responsibility for child protection for the area. In their absence the social services team manager responsible for the child's case must be notified. In all such situations,

the individual employee or professionals own line manager and named professional for child protection should be informed.

Children potentially at greater risk of harm

- 7.20. Many children and young people in our services (Education and care) organisation have an allocated social worker due to safeguarding or welfare needs.
- 7.21. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- 7.22. Local authorities should share the fact a child has a social worker, and the DSP should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
- 7.23. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). Schools/colleges must follow missing from education protocol agreed with their LA.
- 7.24. Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation- particularly county lines. It is important the school or college's response to children missing from education supports identifying such abuse and helps prevent the risk of them going missing in the future.

Unexplained body marks

- 7.25. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises, swellings, cuts and scratches which by and large will be as a result of daily activities or for some Individuals as a result of self-injurious behaviour. However, all marks or physical changes must be recorded appropriately using (number to be added) weekly body chart. A Concern form must be completed for all unexplained marks and physical changes and passed to the DSP (or a deputy) along with copies of the last 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always be kept informed. Concern log should be updated with concern and relevant reference number provided to concern.
- 7.26. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the correct course of action for dealing with unexplained body marks.
- 7.27. The DSP will assign a manager to investigate the concern to ascertain the reason for the marks and if no reasonable explanation can be given the DSP must

contact the Safeguarding Authority/SPOA for further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

- 7.28. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be opened and safeguarding process followed.
- 7.29. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome must be shared with social worker and parents.

A disclosure from an Individual

- 7.30. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart procedure.**
- 7.31. It is important to note that children/young people may not find it easy to tell staff about their abuse verbally. Children/young people can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's/young person's own behaviour might indicate that something is wrong. If staff have any concerns about a child's/young person's welfare, they should act on them immediately rather than wait to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding procedure.**
- 7.32. In case of reports of sexual violence and sexual harassment between children and young people, these are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education and care is not disrupted. It is also important that other children, young people and staff are supported and protected as appropriate.
- 7.33. The service's initial response to a report from a child is incredibly important. How the staff respond to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.
- 7.34. If the child/young person make a disclosure - Listen to what they have to say and take them seriously. Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSP and Safeguarding Authority) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and whom the report will be passed to.
- 7.35. Reflect back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, don't ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- 7.36. Recognise that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the

child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.

- 7.37. Consider the best way of making a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made using Concern form which is part of this policy. The written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report to the DSP must be completed within an hour from the moment of the disclosure being made.
- 7.38. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by Safeguarding Authority and/or part of a criminal investigation.
- 7.39. In cases where either a child/young person informs the staff that an act of FGM – however described – has been carried out on her, or where the staff observes physical signs on a girl appearing to show that an act of FGM has been carried out these situations, the DSP must be informed, who will trigger child protection/safeguarding procedures described in this policy and contact the Police. If a child/young person is at immediate risk – the Police (999) must be contacted immediately. If a child/young person required medical attention, follow steps identified in ‘Setting priorities’ section below.
- 7.40. Remember, do not:
- Investigate the incident
 - Ask leading questions
 - Get the young person to repeat the disclosure over and over
 - Make assumptions or offer alternative explanations
 - Approach/inform the alleged abuser
- 7.41. The procedure for reporting concern is described in **Appendix 8. DSP/DSPP Deputy – actions, reporting and recording procedure.**
- 7.42. All staff know that they can contact the Local Authority direct should that be necessary. Where a safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt with by the local Safeguarding Adult Board.
- 7.43. For allegation made against a staff member or senior managers/directors follow relevant allegations procedures described later on in this policy.
- 7.44. Where contact is made with the Local Authority in which Caretech Pengwern College is geographically located, contact will also be made with the individual’s

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

- 7.45. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be informed immediately and they can take immediate protective action as necessary.
- 7.46. If a member of staff feels their concerns are not being taken seriously then they are to inform a more senior manager, a Director of the Company or contact CIW/Estyn, the local safeguarding boards, the police or the Whistleblowing Hotline – on 0800 086 9128.

Risk Assessment

- 7.47. When there has been a report of sexual violence, the DSP (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
- the victim, especially their protection and support,
 - whether there may have been other victims,
 - the alleged perpetrator(s); and
 - all the other children, (and, if appropriate, adult students and staff) at the school or college especially, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
 - The time and location of the incident, and any action required to make the location safer.
- 7.48. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, staff should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe. The DSP (or a deputy) should ensure they are engaging with Safeguarding Authority and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's or college's approach to supporting and protecting their pupils and students and updating their own risk assessment.

Following a report - what to consider

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

progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children;

- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between children/young people/adults;
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

Options to manage the report

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

7.52. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly

important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given as to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. The four scenarios are:

- **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.
- **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 HSB and may prevent escalation of sexual violence. It is particularly important that the DSP (and their deputies) know what the Early Help process is and how and where to access support.
- 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 DSPs (and their deputies) will need to familiarise themselves with this document.
- **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.
- **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 DSP and their deputies) are clear about the local process for referrals and follow that process.

Unsubstantiated, unfounded, false or malicious reports

- 7.53. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSP should consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding authority may be appropriate.
- 7.54. If a report is shown to be deliberately invented or malicious, the school or college should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Safeguarding and supporting the victim

- 7.55. The needs and wishes of the victim should be paramount (along with protecting the child)/young person in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.
- 7.56. Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- 7.57. The victim should never be made to feel that they are the problem for making a report or made to feel ashamed for making a report. This has been made clear throughout this policy and procedure.
- 7.58. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- 7.59. Services should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- 7.60. Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work

in partnership with schools and colleges to ensure the best possible outcomes for the victim.

Safeguarding and supporting the alleged perpetrator(s)

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

- The school or college will have a difficult balancing act to consider. On the one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials.
- It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- Advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard, which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair.

Setting priorities

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

7.63. Where appropriate, any concerns will be discussed with the Individual's family / carers and where possible their agreement will be sought to making a referral to the Local Authority. However, where there is a conflict of interests between the Individual and parent/guardian, the interests of the Individual must take

priority and Caretech Pengwern College the right to contact the Individual's local authority, Social Care or the Police, without notifying parents/carers if this is in their best interests.

- 7.64. If an urgent medical, attention or advice is required and GP/speciality doctor is not available, staff MUST use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.
- 7.65. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance. Alternatively, if it's assessed to be in the best interest of the child/young person - the DSP MUST take the Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority/Police, remembering that every reasonable effort should be made to inform the parents/carers as soon as possible.
- 7.66. If the suspected abuse is sexual, then the medical professional must determine if the medical examination should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility that the needs of the young person are such that medical attention is the priority, in such case medical professional's judgment must be followed. There must at all times be an Appropriate adult (parent guardian or a social worker) with the individual whether from the Individual's care home/school/college, the Local Authority or the Police, if the parents/carers are not included. This section must be read in conjunction with our **0.29. Child Sexual Exploitation policy**.
- 7.67. Caretech will provide an advocate to each Individual where appropriate, if they are unable to speak for themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA. Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

Allegation of abuse by one or more Individuals on another Individual

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

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

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

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

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

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

Allegations against staff

- 7.71. All allegations must be reported to the DSP Karen Ford (Education) or Nicola Brantley (Residential) or in their absence to a DSP Deputy – see your local Safeguarding poster. In addition, where appropriate - HR Business Partner must be consulted.
- 7.72. When an allegation is made against a member of staff, set procedures must be followed, see the flow chart in **Appendix 3**. Child Protection and safeguarding procedure (Flow chart).
- 7.73. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed and investigated. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.
- 7.74. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided for what to do in the event an allegation is made against them.

Allegations against staff in Education

- 7.75. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors. The allegations are split into two groups:
- Allegations that may meet the harm threshold (see **SPOA 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)**.
- 7.76. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with

children in their present position, or in any capacity with children in a school or college.

- 7.77. The information above relate to members of staff, supply staff, volunteers and contractors who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. It is advised that in Education allegations against people listed above should be referred to the Head/Principal who is often the DSP, however where the Head/Principal is not the DSP, allegations against staff including supply, volunteers and contractors must be referred to the Head/Principal who may liaise with the DSP. This is because the concern/allegation may align with other performance or personal related issues the Head/Principal might already be aware of, whereas the DSP may not be. The Principal/Head should ensure the DSP is briefed as appropriate and will then decide whom the case should be led by – the DSP or themselves. Allegations against a teacher who is no longer teaching should be referred to the police and HR Business Partner advised.
- 7.78. Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the SPOA in line with the local authority's procedures for dealing with non-recent allegations. The SPOA will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.
- 7.79. Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.
- 7.80. Schools and colleges using Behaviour Watch/Databridge/Databridge must ensure that concerns/allegations related to staff ['staff' slip], are set up to be only visible to the selected group of people e.g. Head teacher/Principal or the DSP or both depending on the college's internal arrangement. The same approach must be applied to Real Time Notifications. As the college's arrangements around who will receive staff related concerns will vary between the colleges, it is up to schools to ensure their arrangements are considered when setting up the Concern/SG: Staff function.

Allegations against supply teachers and all workers supplied by agency

- 7.81. In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business.
- 7.82. Whilst the Organisation's schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher

due to safeguarding concerns, without finding out the facts and liaising with the SPOA to determine a suitable outcome. Schools and colleges must also consult HR Business Partner who may advise further. Governance boards and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.

- 7.83. Agencies should be fully involved and co-operate with any enquiries from the SPOA, police and/or children's social care. The school or college will usually take the lead because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the SPOA as part of the referral process.
- 7.84. When using a supply agency, schools and colleges should inform the agency of its process for managing allegations but also take account of the agency's policies and investigatory process and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies. It is important we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be consulted.

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

- 7.85. All allegations must be reported to:
- Education division: Regional Education Lead Richard Winzor unless within residential education Registered Manager is the DSP in which case the matter will be referred to the Head/ Principal. For the DSP fulfilling the role as their substantive role, all allegations must be reported to the Principal/Head.
 - Children's residential care division: Regional Manager Vikki Keenan unless Regional Manager is the DSP in which case the matter will be referred to the Managing Director.
- 7.86. Depending on the division and who is the service DSP, people notified of allegation made (see above) will then refer the matter to Denbighshire Single Point of Access (SPOA) and notify their line manager:
- Education division: Regional Education Lead Richard Winzor or
 - Managing Director for Education Andrew Sutherland.
 - Children's residential care division: Managing Director Graham Norris.
- 7.87. The person who referred the matter to Denbighshire Single Point of Access (SPOA) in line with agreed course of action will decide about who will lead the case including management investigation – should the allegation threshold be

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

- 7.88. In residential education associated with children's homes/care homes the Responsible/Nominated Individual MUST also be notified.
- 7.89. Services using Behaviour Watch/Databridge/Databridge system – allegations made against the DSP or DSP Deputy who have full access to the system including Concern/Safeguarding function, should not be initially entered to the system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as they would have been prior to implementation of the Behaviour Watch/Databridge/Databridge. This is to ensure that no one, including those who are part of the service's Safeguarding Team are able to see the details of their own case which could have a detrimental impact on the investigation itself and the outcome of it. However, once the case has been concluded, a decision should then be made about whether or not the detail related to the case should be retrospectively entered in to Behaviour Watch/Databridge/Databridge or kept in the original format. Such a decision should be made by the Case Manager, Managing Director and a member of HR Team. Should a decision be made to keep it in the original format, a Concern/SG slip in the Behaviour Watch/Databridge/Databridge must still be retrospectively opened and a note added to reflect that there was an allegation made against the DSP/DSP Deputy but without specifying any further detail about the character of the allegation. Instead, a reference number of the case and location of the pack related to the case is provided. This action will ensure that the case has been captured in the system, which will then allow the service to generate a log with accurate numbers of concerns and safeguarding cases for the service.

Allegations against the Regional Manager/other Regional staff

- 7.90. Any allegations linked to the site, must be reported to the DSP of the site (In Education – the Head/Principal) who will make the initial referral to Denbighshire Single Point of Access (SPOA) Following this, the allegation should be passed to the identified senior person to follow through with Denbighshire Single Point of Access (SPOA) and subsequently act in line with agreed course of action. This means that the DSP will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 7.91. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to Denbighshire Single Point of Access (SPOA) and act in line with agreed course of action.
- 7.92. The appropriate HR Business Partner should be notified, so they can advise and where required - support the investigation.

Allegations against the Managing Director

- 7.93. Any allegations linked to the site, must be reported to the DSP of the site (In Education – the Head/Principal) who will make the initial referral to Denbighshire Single Point of Access (SPOA). Following this, the allegation should be passed to the identified senior person to follow through with Denbighshire Single Point

of Access (SPOA) and subsequently act in line with agreed course of action. This means that the DSP will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.

- 7.94. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the matter to Denbighshire Single Point of Access (SPOA) and act in line with agreed course of action.
- 7.95. The Head of HR should be notified, so they can advise and where required - support the investigation.

Allegations against any other Senior Leader

- 7.96. Any allegations linked to the site, must be reported to the DSP of the site (In Education – the Head/Principal) who will make the initial referral to Denbighshire Single Point of Access (SPOA) Following this, the allegation should be passed to the identified senior person to follow through with Denbighshire Single Point of Access (SPOA) and subsequently act in line with agreed course of action. This means that the DSP will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 7.97. Allegations not linked to specific site must be reported to the person's (whom allegation is made against) line manager who will refer the matter to Denbighshire Single Point of Access (SPOA) and act in line with agreed course of action.
- 7.98. The Head of HR should be notified, so they can advise and where required - support the investigation.

Allegations against the Executive Head of Children's Services

- 7.99. Any allegations linked to the site, must be reported to the DSP of the site (In Education – the Head/Principal) who will make the initial referral to Denbighshire Single Point of Access (SPOA). Following this, the allegation should be passed to the identified senior person to follow through with Denbighshire Single Point of Access (SPOA) and subsequently act in line with agreed course of action. This means that the DSP will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 7.100. Allegations not linked to specific site must be reported to reported to Executive Director Compliance – Amanda Sherlock who will refer the matter to Denbighshire Single Point of Access (SPOA) and act in line with agreed course of action.
- 7.101. The Head of HR should be notified, so they can advise and where required - support the investigation.

Allegations against the Chief Executive Officer

- 7.102. Any allegations linked to the site, must be reported to the DSP of the site (In Education – the Head/Principal) who will make the initial referral to Denbighshire

Single Point of Access (SPOA) Following this, the allegation should be passed to the identified senior person to follow through with Denbighshire Single Point of Access (SPOA) and subsequently act in line with agreed course of action. This means that the DSP will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.

7.103. Allegations not linked to specific site must be reported to reported to Group Safeguarding Executive (Compliance and Regulation – Christina Leath,) who will refer the matter to Denbighshire Single Point of Access (SPOA) and act in line with agreed course of action.

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

Allegations - The initial response

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

- **Looking after the welfare of the child** - the DSP is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
- **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the SPOA, the nature, content and context of the allegation, and agree a course of action.

7.106. When dealing with allegations, schools and colleges should:

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

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

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

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

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

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

7.110. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance Keeping Learners Safe.

7.111. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the strategy discussion or initial assessment decides that is the case, the SPOA should discuss the next steps with the case manager (A 'case manager' will be the person leading any investigation. This will be either the DSP/DSP Deputy which is often the Principal/Head/Registered Manager or, where the case manager is the subject of an allegation, it will be the Proprietor or a Director nominated by them). A SPOA should be informed who will lead investigation to ensure there is no conflict of interest or any other concerns related to the choice of the case manager.

No Further Action

7.112. Where the initial discussion initial discussion leads to no further action, the case manager and the Designated Officer should:

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

Further enquiries

7.113. Where further enquiries are required to enable a decision about how to proceed, the SPOA and case manager should discuss how and by whom the investigation

will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's or college's staff.

- 7.114. Where there is a lack of appropriate resource within the school or college, or the nature or complexity of the allegation requires it, the allegation will require a senior member of the off-site team: Regional Manager (Education or Care), a Director, HR Business Partner or an independent investigator if appropriate.
- 7.115. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.
- 7.116. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The SPOA will provide advice and guidance to schools and colleges when considering allegations against adults working with children. The SPOA's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

Suspension

- 7.117. Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college, or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the school or college is/are at risk of harm,

or the allegation could be considered as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR Business Partner.

7.118..

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

Allegation outcomes

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

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

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

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

Serious incident reporting

7.123. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported as

outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

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

7.124.

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

- Call the Ambulance and Police
- Unless the 999 operator tells you to, do not touch the person; do not move anything around them, which may form part of forensic evidence. Police will decide about the forensic examinations and appropriate security of the scene.
- DSP will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI) reporting procedure. The DSP will contact

the Managing Director of the division they work in and verbally inform them of what happened before completing SUI Part 2.

- DSP will contact Children's/Adults Social Care Team
- Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services (CAMHS) should also be notified by the Safeguarding Authority.

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

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

- Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager following the **35.01. Caretech Children's services SUI process.**
- Next of kin/parents/carers of the deceased.
- Where the death of an individual occurs in an education location the assistance of the local police and social services department should be sought in informing the parents/guardians.
- The appropriate regulatory body: e.g. CIW, Estyn
- Ministry of justice if applicable.
- The placing authority/authorities.
- The local authority responsible for Social Services and Education (where the death takes place in a registered school) within whose area the education location is situated.
- The District Health Authority within whose area the education location is situated.
- The Department for Education, (where the death takes place in a registered school).
- The Health and Safety Executive.

Abuse of position of trust

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

be a criminal offence, even if that young person is over the age of consent.

Visitors

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

Volunteers

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

Contractors

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

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

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

Extended school and off-site arrangements

- 7.132. Where extended off-site activities are provided by and managed by us, our safeguarding policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate policies and procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSP is kept appropriately informed.
- 7.133. When our Individuals are doing off-site activities, including day and residential visits and work related activities, we will risk assess and check that effective safeguarding



arrangements are in place. The DSP will be kept appropriately informed.

Use of mobile phones

- 7.134. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media access including **Pro 01. Mobile Telephony Policy** at all times.
- 7.135. All computer equipment and internet access within the home/school/college is subject to 'parental controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the many learning and social opportunities available through the internet and social media.
- 7.136. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST neither mention Pengwern College or refer to their employment at the college. Staff are advised not to communicate with parents, guardians, carers or Individuals via social networking sites

Photography and images

- 7.137. This section should be read in conjunction to our **GIG 02. Data Protection policy**.
- 7.138. The vast majority of people who take or view photographs or videos of Individuals do so for entirely innocent and acceptable reasons. Sadly, some people abuse

children or vulnerable young people through taking or using images, so we have some safeguards in place.

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

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

Physical intervention and use of reasonable force

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

Staff Taking Medication or other substances

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

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

Information for individuals and relatives/carers

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

7.144. They will also be advised that they can nominate an advocate or representative to speak and act on their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be appointed.

They will be advised of rights to legal aid in where appropriate to victim support and compensation.

Recruitment and vetting

- 7.145. Each Education location maintains a Single Central Record (SCR). This covers all staff including supply teaching and teacher trainees, agency care staff as well as multisite managers and members of the proprietor body. This is regularly audited by the school/college SLT and available for inspection.
- 7.146. For agency workers we obtain written confirmation that all checks have been completed, in line with safer recruitment from the employment business that is supplying the member of agency staff. All Locations must ensure that an agreement exists between the Location and the agency to confirm that, in the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate before that person can begin work at the home/school/college.
- 7.147. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the agency.
- 7.148. Where other Caretech staff (e.g. care staff) work on the same site as a school they must be subject to the same recruitment regulations and procedures as the education staff.

Requirements to inform Disclosure and Barring Services (DBS)

- 7.149. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
- 7.150. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one month after leaving the Location) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- 7.151. In the case of a member of teaching staff at a school or sixth form college, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
- 7.152. Referrals to the Disclosure and Barring Service will be made for any person (whether employed, contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she is considered unsuitable to work with children and young people.
- 7.153. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is provided at paragraph 179.
- 7.154. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they can ensure any future references are correct. The references

team log referrals so this can be completed. This will apply to both: DBS and TRA.

Record keeping

- 7.155. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is made, staff must keep clear and accurate records using a Concern Form.
- 7.156. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch/Databridge/Databridge have Concern/Safeguarding function to record any concerns being raised. A report per child/young person can also be generated.
- 7.157. Records should be factual, accurate, concise, ethical and relevant.
- 7.158. All recording of written information should be legible and discussions with other professionals and agencies should be recorded chronologically.
- 7.159. There will be a safeguarding section/folder for each Individual, which will hold any concerns/safeguarding documentation for that individual. At the front of each folder, there is an Index for Individual's Concerns. This is to enable the location to keep accurate records of any concerns raised regarding the individual and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure location.
- 7.160. Each location apart from those using Behaviour Watch/Databridge/Databridge system will also maintain **25.07. Central Log of Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information where the concern has escalated. Where this is held as a paper version this is to be made into a bound booklet and completed by the DSP. If kept electronically, access is to be restricted to the DSP and deputies only. In either case, this should be kept in a secure location.

Monitoring

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

Training

- 7.162. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction introduces the new staff member to the policy, procedure and practice at the location. They will also be orientated as to where to find information regarding safeguarding including relevant posters around the

location. As part of their induction all staff are required to read this policy and confirm that, they understand their role in safeguarding and protecting young people within the service they are going to work.

- 7.163. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must be completed as part of staff member induction and annually thereafter. This should include online safety. This is to maintain staff awareness of their responsibilities in relation to children /young people/young adult's safeguarding.
- 7.164. Staff will not be allowed to work with Individuals unless they have completed the above training. The school/college/home must check that supply/agency staff have completed basic awareness training before being allowed into contact with Individuals.
- 7.165. Contractors and others on site who might have unsupervised access to Individuals must also complete basic awareness training before being allowed to start work.
- 7.166. The DSP will ensure that all staff receive regular updates regarding safeguarding policy, procedure and practice throughout the year. This can be undertaken in various forums: as a face-to-face or online session, staff meetings or workshops. In addition to this, safeguarding updates including various resources are provided to schools and colleges by the external Safeguarding Network.
- 7.167. The DSP and DSP Deputies should undergo the same level of training providing them with the knowledge and skills required to carry out the role. The DSP's/DSP Deputies' training should be provided by the LA within the boundaries they operate and be refreshed at least every two years. Both should also undertake Prevent awareness training.

Confidentiality and information sharing

- 7.168. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting child's/young person's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children/ young people whether this is when problems are first emerging, or where a child is already known to local authority children's social care.
- 7.169. Where the police are involved, wherever possible the school or college should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.
- 7.170. The Safeguarding authority should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation need protection or services, so that any information obtained in the course of those

enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

- 7.171. The case manager should take advice from the SPOA, police and Safeguarding Authority to agree the following:
- 7.172. who needs to know and exactly what information can be shared;
- 7.173. how to manage speculation, leaks and gossip
- 7.174. what, if any, information can be reasonably given to the wider community to reduce speculation; and
- 7.175. how to manage press interest if, and when, it should arise.
- 7.176. Exchange or disclose of personal information with other agencies will be completed in accordance with **GIG 02. Data Protection** and **GIG 09. Confidentiality Code of Practice** and all relevant legislation including the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- 7.177. Information relating to individual Safeguarding cases is confidential, although some information can be shared with relevant staff. This should be done only on a 'need to know' basis.
- 7.178. Governance Boards and proprietor should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
- 7.179. being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- 7.180. understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- 7.181. for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations

under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

- 7.182. When sharing safeguarding information regarding an individual, staff will need to consider the following:
- 7.183. Information should only be shared on a 'need to know' basis when it is in the best interests of the individual
- 7.184. Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse or neglect, it may be necessary to override the requirement
- 7.185. Distinguish fact from opinion
- 7.186. Ensure you are giving the right information about the right person
- 7.187. Ensure you are sharing information securely
- 7.188. Inform the person that the information has been shared if they were not already aware of this and if it would not create or increase risk of harm to them/others.
- 7.189. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping learners safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 7.190. Further details on information sharing can be found in:
- 7.191. Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers . The seven golden rules for sharing information will be especially useful
- 7.192. The Information Commissioner's Office (ICO) , which includes ICO GDPR FAQs and guidance from the department
- 7.193. Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.
- 7.194. The following wording is to be added to any covering letter where we are sharing documentation:
- 7.195. "The material contained in this letter and its enclosures are confidential to Caretech and the persons named within the documentation. The documentation is delivered only in accordance with a perceived legal obligation to make the documentation available and upon the strict understanding that the recipient and all members of the recipient's staff will undertake to preserve confidentiality and not in any way share the documentation or any details of the information therein contained with any other party. Any person receiving this information who breaches these obligations of confidentiality will be held strictly responsible and will be expected to indemnify Caretech and any persons named within the

documentation against any losses that may arise as a result of misuse of this material”.

7.196. If in doubt, the DSP or deputies must liaise with the company Caldicott Guardian. The contact details for the Caldicott Guardian at our location is [Sarah Longley-Cook, Interim Clinical Director].

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

Complaints and Monitoring

7.198. All complaints arising from the operation of this policy will be considered under the **0.22 complaints procedure**, with reference to the our Designated Safeguarding Officers who are Karen Ford), Nicola Brantley (Residential HoC) and Jane Beard (Education HoE)(DSP) and Denbighshire Single Point of Access (SPOA) Safeguarding Children's Board

8. Accountability

- 8.1. Karen Ford, Nicola Brantley and Jane Beard are the DSPs at Caretech Pengwern College and have lead responsibility for protecting and safeguarding children, young people and young adults and liaising with the local authority and other local agencies as appropriate. This includes young person protections, referrals, raising awareness, training, allocating resources and supporting/directing staff within the Location. In all matters, relating to young person protection and safeguarding Pengwern College will follow the procedures outlined in this policy.
- 8.2. The content and effective implementation of policy and procedures are subject to routine monitoring by the Head of Service. Our Operations Director Graham Norris will undertake a full annual review of the content and effective application of this policy and associated procedures. The date for the next scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in legislation, regulatory requirements or as a result of best practice guidance.
- 8.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director Compliance, who will support and promote the development of initiatives to improve the prevention, identification and response to abuse and neglect. As the Director accountable for safeguarding, she is also responsible for reporting on safeguarding and providing executive leadership.
- 8.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can be stressful and distressing for staff.
- 8.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors, allied health professionals and nurses) should

understand how their professional standards and requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

- 8.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level need to share a common view of what types of behaviour may be abuse or neglect and what should be an initial response to suspicion or allegation of abuse or neglect.
- 8.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies which define the local practice that must be followed.
- 8.8. In the event that the DSP or DSP Deputy are on leave or away from the Location and not contactable alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact names and details if required.

9. Further Safeguarding information – what everyone needs to know (Appendix 12)

- 9.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues such as child on child/young adult

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

10. Appendices

Appendix 1: Relevant policies and documents

1. Child Protection and Safeguarding
 - a) 25.01 - Index Form for Individuals Concern File
 - b) 25.02 - Abuse Poster Individual
 - c) 25.03 - Individual Safeguarding booklet – Easy Read
 - d) 25.04 - Concern Form
 - e) 25.05 - Safeguarding Tracking Pack
 - f) 25.06 – Visitor Information Leaflet template
 - g) 25.07 – Central Log of Concerns and Safeguarding – excel version
 - h) 25.08 – Guidance to staff who had an allegation made against them
 - i) 25.09 – Local Safeguarding procedure
 - j) 25.10 – Staff Safeguarding Information poster
 - k) 25.11 – Guidance notes for Designated or On call person
 - l) 25.12 – Static body chart
 - m) 25.13 – Weekly body chart
 - n) 25.14 – Guidance for Investigating Unexplained Body Marks
 - o) 25.15 – Guidance to Child Protection and Safeguarding at Caretech
2. Whistleblowing
3. Anti-bullying
4. Child Sexual Exploitation
5. Intimate and Invasive Care
6. Self-harm and suicide
7. Behaviour Support
8. Physical Intervention
9. Complaints Policy
10. Health



11. E –safety
12. Capacity to consent
13. Prevent
14. Recruitment
15. Code of Conduct
16. Data Protection
17. Confidentiality
18. E- safety
19. Disciplinary
20. Complaints
21. Code of Practice
22. Mobile telephony
23. SUI Caretech children's services process
24. Caretech - Group Leaving Policy
25. GHR 02 – Harassment and Bullying
26. GHR 41 – Reference Requests
27. GHR 41.1 DBS referral log

Appendix 2: Legislation and guidance

- All Wales safeguarding procedures 2019
- Anti-racist Wales action plan 2023
- Education workforce council main functions regulations 2015
- Independent inquiry into child sexual abuse
- Independent special post-16 institutions guidance
- Keeping learners safe 2022
- Managing risk of radicalisation in your education setting 2023
- Peer-on-peer sexual harassment among 16 to 18-year-old learners in further education
- Prevent duty guidance: for further education institution in England and Wales (2023)
- Procedures for reporting misconduct and incompetence in the education workforce in Wales (gov.wales) (2015)
- Protection of freedoms act 2012
- Reducing restrictive practices 2022
- Safe and effective intervention- use of reasonable force and searching for weapons
- Safeguarding children in education: handling allegations of abuse against teachers and other staff
- Safe learning communities 2019 (Work-based learning only) • Social services and well-being (Wales) act 2014
- Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015 • Supporting learners with healthcare needs • Welsh Government Health and Safety Code of Practice for Contracted Provision

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

DSP– DSP

CSC– Children's Social Care

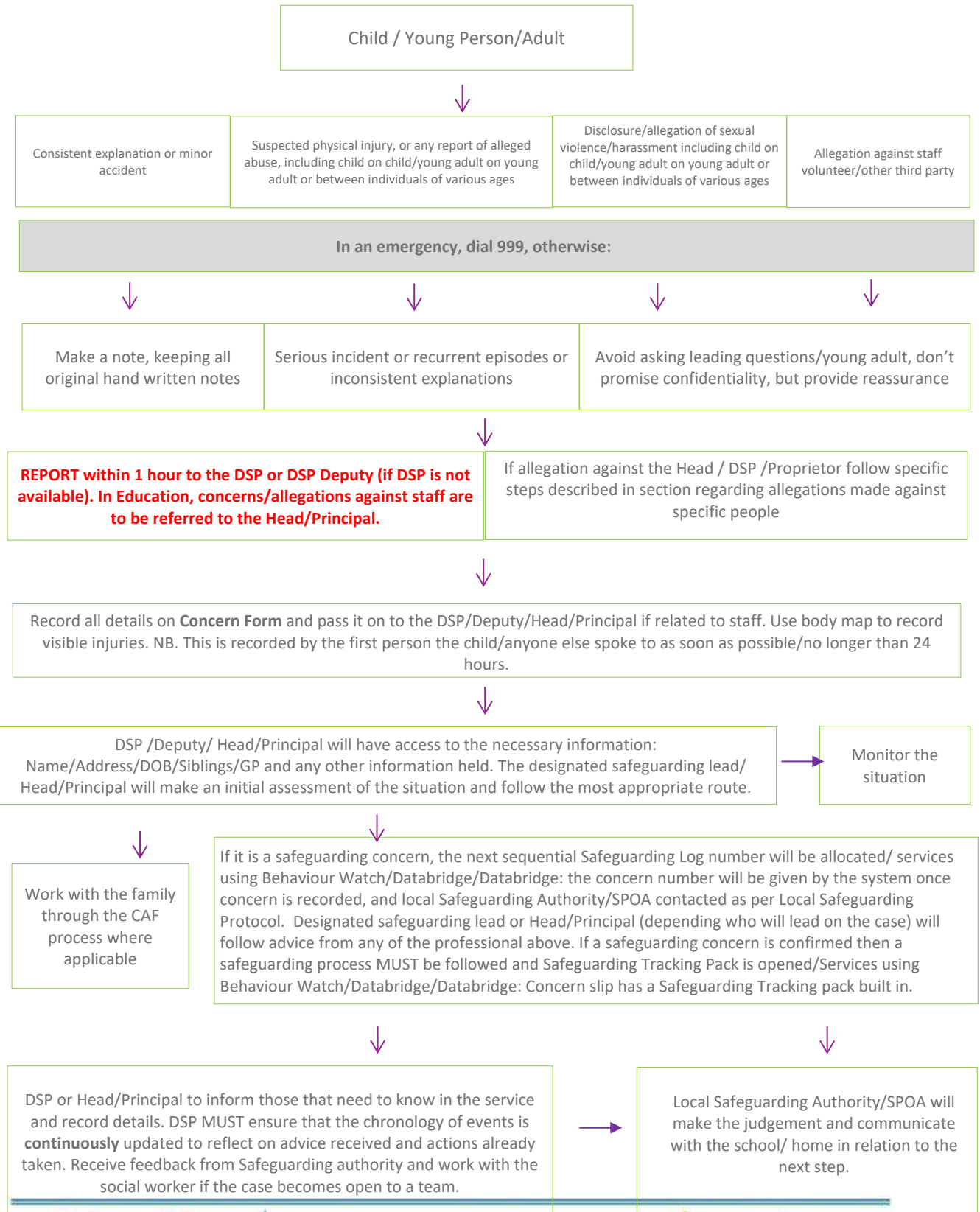
CAF – Common Assessment framework

SPOA – Local Authority

Designated Officer

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Appendix 4: Types of abuse – children

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children
- **Physical abuse:** a form of abuse, which may involve hitting, slapping, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children or young adults by other young adults or between individuals of different age is a specific safeguarding issue in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.
- **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual Exploitation

does not always involve physical contact; it can also occur through the use of technology.

- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through social media, online games or other channels of digital communication. Children can also be re-victimised if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual communication with a child; and, causing a child to view images or watch videos of a sexual act. Using technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that are perpetrated online and constitute abuse, children may also be exposed to online harms, such as inappropriate behaviours or content online. For instance, children may be bullied online by other children/young people/young adults they know/others who they don't know or they might, either accidentally or intentionally, view content, which is intended for adults. Both online abuse and exposure to unsuitable content or behaviour can have a long-lasting impact on the wellbeing of children and young people.

Appendix 5: Types of abuse - adults

- **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding or withholding food, unauthorized restraint, restricting movement.
- **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the honour of the family and/or the community including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be handled and escalated as such. Professionals in all agencies, individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence and abuse include any

incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality.

- **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual masturbation of either or both persons, non-consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, Indecent exposure.
- **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, appointee ship or other legal authority.
- **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.
- **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010). Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard service provision relating to a protected characteristic.
- **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and supervision, insufficient staff

or high turnover resulting in poor quality care, abusive and disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating, not offering choice or promoting independence, misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints.

- **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
- **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances, where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more appropriate under the parts of the Care Act dealing with assessment, planning, information and advice, and prevention.

Appendix 6: Signs that someone could be a victim

Physical abuse

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

Sexual abuse

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

Psychological or emotional abuse

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

Neglect and acts of omission

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene



- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organizations
- A build-up of medication that hasn't been taken
- Uncharacteristic failure to engage in social interaction
- Unsuitable clothing or not enough clothes

Domestic abuse

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

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

- absence from school or disengagement from school activities
- physical injuries
- mental or emotional health issues
- becoming withdrawn – lack of self esteem
- lack of sleep
- alcohol or substance misuse
- changes in behavior
- inappropriate behavior doe age
- abusive towards others

Appendix 7: Signs that someone could be an abuser

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

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

- Staff notifies the DSP /Head/Principal of their concern as soon as it is possible but no later than within 1 hour from the moment of disclosure/report from the child/young person/other person completes and passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of disclosure/report. If the DSP is unavailable, passes it on to the DSP Deputy. In Education, if the concern is related to the staff and the Head/Principal is not available, staff must report their concern to the DSP instead, so there is no delay in reporting of the concern. The DSP will then liaise with the Head/Principal to agree on the next step. Services using Behaviour Watch/Databridge/Databridge: staff must report their concern verbally before completing the Concern/Safeguarding slip in the system.
- DSP/DSP Deputy or Head/Principal (depending on who will lead on the case) enters the concern details on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on the Concern Form. Services using Behaviour Watch/Databridge/Databridge – DSP/DSP Deputy or Head/Principal reviews the concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).
- If it is deemed to be a child protection/safeguarding (children and adults) matter the DSP/DSP Deputy or Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and immediately (or at least within one hour of receiving the concern form, make a referral to the local Safeguarding Authority and the Local Authority Designated Officer (SPOA) where required, to discuss the allegation and agree a course of action. DSP/DSP Deputy or Head/Principal using the Behaviour Watch/Databridge/Databridge system will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible to the Safeguarding Team.
- If the local Safeguarding Authority/SPOA confirms that they do not consider the matter to be a safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal Investigation. The Head of Service/Head/Principal/DSP/DLS Deputy MUST ensure that a member of their Senior Management Team is assigned to look into the concern. The review must be recorded and outcomes shared with the people involved. Feedback from the review session MUST be provided to local Safeguarding Authority/SPOA. Services using the Behaviour Watch/Databridge/Databridge system will follow the same set of steps apart from populating the Central Log of Concerns and Safeguarding as the log can be generated by the system using chosen filtering criteria.
- It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken. This diligent approach will ensure a clear historic record of contact with local Safeguarding Authority/SPOA for any matter which is

deemed by the DSP to be of concern and has been raised with the local Safeguarding Authority/SPOA whichever appropriate.

- If the local Safeguarding Authority/SPOA confirms that the matter is a safeguarding concern and that it requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must be opened with the next sequential Safeguarding Reference included on the form and details as such entered on the central log.
- Services using the Behaviour Watch/Databridge/Databridge system – where a concern progresses to Safeguarding Tracking Pack being opened, a one record will be created including the original concern, with the whole document having the same slip number.
- Services which don't use Behaviour Watch/Databridge/Databridge or where the concern/allegation is about the Head/Principal or the DSP who have access to BW: Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the **Responsible/Nominated Individual and** in day schools - **Regional Education Manager** as a follow up to the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual and Regional Education Manager** on completion, providing detailed overview of the actions taken and the final outcome. Services using the Behaviour Watch/Databridge/Databridge will be able to trigger live notification to the Regional Manager (Education/Care), Responsible/Nominated Individual and Registered Manager – where appropriate. The **Responsible/Nominated Individual and Regional Education Manager** in day schools will update relevant Directors. This original form will be saved in the Safeguarding file/Behaviour Watch/Databridge/Databridge – Concern/SG module.
- In the case of serious harm, and/or the child/young person or young adult is in immediate danger the local Police should be informed immediately as well and they can take immediate protective action as necessary.
- If the matter is a more general concern then ensure that the 'Action Taken' log on the concern form is completed and the form is filed within the Safeguarding file. Either way the form must be signed by the DSP/DSP Deputy or Head/Principal. Services using the Behaviour Watch/Databridge/Databridge system can use Concern/Safeguarding 'Other' slip to record concerns which are not related to children/young people, staff or children/young people and staff.
- The relevant concern form should be referenced in the Individual's **25.01 Index form for Individual concern/safeguarding file** and the site's **25.07 Central Log of Concerns and Safeguarding**. Services using Behaviour Watch/Databridge/Databridge will be able to filter information per chosen criteria

and also generate reports per each child/young person in the school, college, children's or care homes.

- All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack /Behaviour Watch/Databridge/Databridge Concern/SG module.**
- The Safeguarding Concern will remain open until local Safeguarding Authority/SPOA have confirmed in writing that the concern is closed and Responsible/Nominated Individual and Regional Education Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the Safeguarding file.
- If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local Authority and/or the police. The individual can be kept in their care home or on the school/college site fully supported (e.g. if they are a day student) if advised to do so.
- The parent/carers should be informed and a decision should be made with the Local Authority and the Police about what action is to be taken and whom by.
- If the DSP/DSP Deputy or Head/Principal is unsure about what the Individual has said or what has been said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse referral but may help to clarify the situation but they must record all details of any conversation and advice received on a concern form. He/she can then move to a formal referral or actively monitor the situation.
- The local Safeguarding Authority/SPOA will oversee any subsequent investigation of any suspicion or allegation of abuse directed against anyone working within the establishment. The establishment **MUST** not internally investigate any allegations of abuse without first taking instruction from the local Safeguarding Authority/SPOA.
- Once agreed by local Safeguarding Authority/SPOA that the provider can commence the internal management investigation (level 2), the investigation process will commence.
- Once agreed by local Safeguarding Authority/SPOA that the investigation will be completed by the external agency (level 3), Head of Service/Head/Principal /DSP/DSP Deputy will take appropriate steps to assist the external agency to ensure the investigation is completed without a delay.
- Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within the time frame specified by their regulator. This is regardless of who leads on the investigation and whether or not the investigation has been concluded.
- If as the result of an investigation there has been a substantiated allegation against a member of staff, we will work with the local Safeguarding



Authority/SPOA to determine whether there are any improvements to be made to our safeguarding policy, procedures and practice to prevent similar events in the future. Also, we will work with our internal Human Resources department and may commence proceedings under **GHR 27. Disciplinary policy and procedure.**



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

Appendix 9: Key contacts

DSP is Karen Ford (SLT - Principal)

Telephone (24hrs) 07469155109
karen.ford@cambiangroup.com

Email:

DSP is Nicola Brantley (SLT – Head of Care)

Telephone (24hrs) Email:
nicola.brantley@cambiangroup.com

DSP is Jane Beard (SLT – Head of Education)

Telephone (24hrs) 07469155098 Email:
jane.beard@cambiangroup.com

DSP Deputy is Lyndsey Shaw (Residential)

Telephone (24hrs) 07917781941 Email:
Lyndsey.shaw@cambiangroup.com

DSP Deputy is Alethea Coulston (Education)

Telephone (24hrs) 07732602217 Email:
alethea.coulston@cambiangroup.com

DSP Deputy is Anthony Pritchard (Education)

Telephone (24hrs) 07786981572 Email:
anthony.pritchard@cambiangroup.com

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

Telephone (24hrs) 07469155117 Email:

Headteacher/Principal is Karen Ford

Telephone (24hrs) 07469155109 Email:
karen.ford@cambiangroup.com

Home Manager is Nicola Brantley Email: Nicola.brantley@cambiangroup.com

Telephone (24hrs) 07917 781840

Telephone (24hrs) 07701314378

Operations Director is Graham Norris
Graham.Norris@cambiangroup.com
Care (SEN)

Email:

Telephone (24hrs) 07580 864354

Telephone (24hrs)

Email:

Group Executive Director – Children’s Services is Jeremy Wiles

Telephone: 079190232207

Email: Jeremy.Wiles@caretech-uk.com

Group Lead Safeguarding is Christina Leath (Compliance and Regulation)

Telephone: 01707 601 800
uk.com

Email: Christina.Leath@caretech-uk.com

Representative, Proprietor - Caretech Education Services is Graham Norris
Operations Director Care (SEN)

Telephone: 07580 864354
Graham.Norris@cambiangroup.com

Email:

Local authority

Denbighshire Local Authority & Denbighshire Single Point of Access (SPOA)
Telephone 03004561000

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

Outside of office hours emergencies
Social Services : 03450533116

The non-emergency police telephone number is: 101.

For young people under the age of 18:

The Local Safeguarding Authority
Denbighshire Single Point of Access

Telephone: (Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-5:00pm
Outside of office hours/weekends, the social services emergency duty team can be
contacted on: **0345 053 3116**

Local Safeguarding Authority

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

Address: Denbighshire County Council

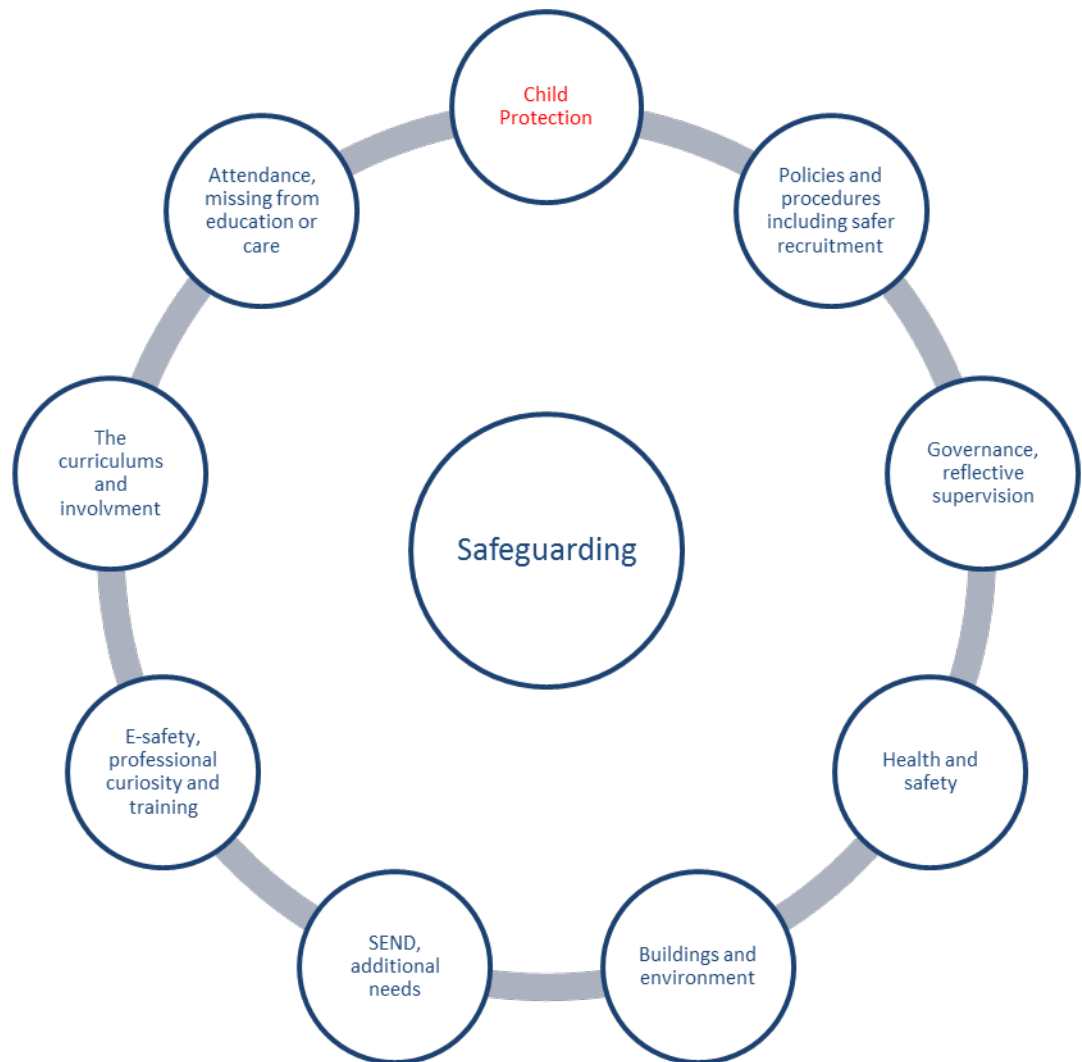
PO Box 62

Ruthin

LL15 9AZ

Telephone (24hrs): 03004561000

Appendix 10. Safeguarding in children's Services - illustration



Appendix 11. Low – level concerns (Education)

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

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the SPOA.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Sharing Low - level concerns

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

10.4. Whether all low-level concerns are shared initially with the DSP (or other nominated person for example DSP deputy or with the head teacher/principal is a matter for the school or college to decide. If the former, then the DSP/DSP Deputy should inform the head teacher/principal of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. **The head teacher/principal should be the ultimate decision maker in respect of all low-level concerns**, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSP in some

schools/colleges, the head teacher/principal may wish to consult with the DSP and take a more collaborative decision-making approach. Some schools' or college's Head teacher/Principal is also the DSP in which case all low – level concerns should be reported to them or other nominated person for example DSP Deputy).

- 10.5. Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.
- 10.6. If schools and colleges are in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their SPOA.
- 10.7. Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 10.8. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

Responding to low - level concerns

- 10.9. If the concern has been raised via a third party, the head teacher/principal (or a nominated deputy) should collect as much evidence as possible by speaking:
 - directly to the person who raised the concern, unless it has been raised anonymously, and
 - to the individual involved and any witnesses.
- 10.10. The information collected will help them to categorise the type of behaviour and determine what further action may

need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken.

Recording low - level concerns

- 10.11. All low-level concerns should be recorded in writing. The Concern/Safeguarding slip in Behaviour Watch/Databridge/Databridge should be completed, as this is the place to record all concerns being raised. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- 10.12. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the SPOA.
- 10.13. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
- 10.14. It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

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

Contextual safeguarding

10.15.

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

10.16.

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

10.17.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face-to-face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of

[Type here]

abusive images and pornography, to those who do not want to receive such content.

10.18.

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

10.19.

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

10.20.

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

Bullying

10.21.

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

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

10.22.

Boarding schools, residential special schools, residential colleges and children's homes and care homes for young adults attending education (FE colleges) have additional factors to consider with regard to safeguarding. Schools and colleges that provide such residential accommodation and/or are registered as children's homes should be alert

to signs of abuse in such settings (for example, inappropriate pupil or student relationships and the potential for the abuse between individuals of the same/similar age or different age, particularly in schools and colleges where there are significantly more girls than boys or vice versa) and work closely with the host local authority and, where relevant, any local authorities that have placed their children there. All residential setting within the Organisation children's service will continuously maintain their communication with the internal and external Education providers to ensure the additional factors are being considered and any concerns shared in a timely manner and with the right people.

10.23.

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

10.24.

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

10.25.

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

10.26.

The communication with each individual throughout the process of child on child/young adult on young adult or between individuals of different age investigation must be



regular, proportionate and take place using suitable communication.

10.27.

In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't receive timely and appropriate support from the school/college, hence the communication and support must become one of the critical points of a significant priority to those responding to and those managing child on child/young adult on young adult/between individuals of different age abuse cases including those of a sexual nature. Other consideration for all providers were:

- to assume it is happening here and plan accordingly
- work on and strengthen the whole school, college, children's/care home approach to developing a safeguarding culture
- to ensure staff model respectful behaviour
- to ensure children and young people are clear about acceptable and unacceptable behaviour
- to ensure children/young people are confident to ask for help
- to ensure carefully planned and implemented RSHE curriculum
- to ensure the behavioural approach with sanctions & interventions for poor behaviour
- to have mechanisms to support students who need it in the way they need it
- to ensure staff have access to suitable training & that there is clear expectation for staff and Managers
- to ensure pupil's voice in heard and responded to
- to ensure DSPs have some protected time to engage with local safeguarding partners and SPOAs, so those relationships can be strengthened.
- to ensure staff follow the guidance in Keeping Learners Safe in Education

10.28.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child on child/young adult on young adult abuse

170		or abuse between individuals of different age, they should
171		speak to their DSP (or deputy).
172	10.29.	The Organisation has zero - tolerance approach to any
173		type of abuse including sexual violence and harassment.
174		Staff must NOT take the view that it doesn't not happen in
175		their setting.
176	10.30.	The Organisation recognises that it is more likely that girls
177		will be victims and boys' perpetrators, but that all types of
178		abuse between children of the same, similar of different
179		ages is unacceptable and will be taken seriously. It is
180		essential that all victims are reassured that they are being
181		taken seriously and that they will be supported and kept
182		safe.
183	10.31.	Abuse between individuals of the same, similar or different
184		age is most likely to include, but may not be limited to:
185		
186		• bullying (including cyberbullying, prejudice-based and discriminatory bullying);
187		• abuse in intimate personal relationships between peers
188		• physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
189		causing physical harm (this may include an online element which facilitates,
190		threatens and/or encourages physical abuse)
191		• sexual violence, such as rape, assault by penetration and sexual assault; (this
192		may include an online element which facilitates, threatens and/or encourages
193		sexual violence).
194		• sexual harassment, such as sexual comments, remarks, jokes and online
195		sexual harassment, which may be standalone or part of a broader pattern of
196		abuse;
197		• causing someone to engage in sexual activity without consent, such as forcing
198		someone to strip, touch themselves sexually, or to engage in sexual activity
199		with a third party
200		• consensual and non-consensual sharing of nudes and semi nudes' images and
201		or videos (also known as sexting or youth produced sexual imagery). For more
202		information about this read UKCIS guidance: Sharing nudes and semi-nudes
203		advice for education settings .
204		• Upskirting which typically involves taking a picture under a person's clothing
205		without their permission, with the intention of viewing their genitals or buttocks
206		to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
207		and
208	10.32.	initiation/hazing type violence and rituals (this could
209		include activities involving harassment, abuse or

210 humiliation used as a way of initiating a person into a group
211 and may also include an online element)

212 10.33. Staff must be clear as to the school/college's/home's
213 procedures with regards to child on child/young adult on
214 young adult abuse, abuse between individuals of different
215 age and the important role they have to play in preventing
216 it and responding where they believe a child may be at risk
217 from it.

218 10.34. All Individuals will be provided with safeguarding
219 information in a format, which is appropriate for their
220 understanding and communication. This may take the form
221 of posters or a leaflet/booklet.

222 10.35. All contact behaviours that have a sexual nature to them
223 such as pushing or rubbing against, grabbing bottoms,
224 breasts or genitals, pinging or flicking bras, lifting skirts or
225 pulling down trousers will be challenged by staff and
226 appropriate levels of action, which may include disciplinary
227 action will be taken. This is to ensure children/young
228 people and staff are clear that these behaviours will not be
229 tolerated or acceptable. However, it is critical to state that
230 some children with cognitive impairment may not be able
231 to fully understand how children on the receiving end of
232 such behaviour may feel, therefore staff will work with each
233 of the children affected by the situation in order to enhance
234 their understanding of the seriousness of their behaviour,
235 so any behaviour of such nature in the future can be
236 prevented.

Serious violence

238 10.36. All staff should be aware of the indicators, which may
239 signal children are at risk from, or are involved with serious
240 violent crime. These may include increased absence from
241 school, a change in friendships or relationships with older
242 individuals or groups, a significant decline in performance,
243 signs of self-harm or a significant change in wellbeing, or
244 signs of assault or unexplained injuries. Unexplained gifts
245 or new possessions could also indicate that children have
246 been approached by, or are involved with; individuals
247 associated with criminal networks or gangs and may be at
248 risk of criminal exploitation.

249 10.37. All staff should be aware of the range of risk factors which
250 increase the likelihood of involvement in serious violence,
251 such as being male, having been frequently absent or
252 permanently excluded from school, having experienced
253 child maltreatment and having been involved in offending,
254 such as theft or robbery. Advice for schools and colleges

255 is provided in the Home Office's Preventing youth violence
256 and gang involvement and its [Preventing youth violence](#)
257 [and gang involvement](#).

258 10.38. Sexual violence and sexual harassment can occur
259 between two or more children of any age and sex, from
260 primary through to secondary stage and into college. It can
261 occur also through a group of children sexually assaulting
262 or sexually harassing a single child or group of children.
263 Sexual violence and sexual harassment exist on a
264 continuum and may overlap; they can occur online and
265 face-to-face (both physically and verbally) and are never
266 acceptable. Schools and colleges should be aware of the
267 importance of:

- 268 • making clear that there is a zero-tolerance approach to sexual violence
269 and sexual harassment that it is never acceptable, and it will not be
270 tolerated. It should never be passed off as "banter", "just having a laugh",
271 "a part of growing up" or "boys being boys". Failure to do so can lead to a
272 culture of unacceptable behaviour, an unsafe environment and in worst-
273 case scenarios a culture that normalises abuse, leading to children
274 accepting it as normal and not coming forward to report it.
- 275 • recognising, acknowledging, and understanding the scale of harassment
276 and abuse and that even if there are no reports it does not mean it is not
277 happening, it may be the case that it is just not being reported.
- 278 • challenging physical behaviour (potentially criminal in nature) such as
279 grabbing bottoms, breasts and genitalia, pulling down trousers, flicking
280 bras and lifting up skirts. Dismissing or tolerating such behaviours risks
281 normalising them.

282 10.39. Sexual violence and sexual harassment between children
283 can occur between two children of **any age and sex from**
284 **primary to secondary stage and into colleges. It can**
285 **also occur online.** It can also occur through a group of
286 children sexually assaulting or sexually harassing a single
287 child or group of children.

288 10.40. Children who are victims of sexual violence and sexual
289 harassment will likely find the experience stressful and
290 distressing. This will, in all likelihood, adversely affect their
291 educational attainment and will be exacerbated if the
292 alleged perpetrator(s) attends the same school or college
293 or lives in the same children's/care home. Sexual violence
294 and sexual harassment exist on a continuum and may
295 overlap; they can occur online and face to face (both
296 physically and verbally) and are never acceptable. All staff

297		working with children are advised to maintain an attitude
298		of 'it could happen here'.
299	10.41.	It is essential that all victims are reassured that they are
300		being taken seriously and that they will be supported and
301		kept safe. A victim should never be given the
302		impression that they are creating a problem by
303		reporting sexual violence or sexual harassment. Nor
304		should a victim ever be made to feel ashamed for making
305		a report.
306	10.42.	Reports of sexual violence and sexual harassment are
307		extremely complex to manage. It is essential that victims
308		are protected, offered appropriate support and every effort
309		is made to ensure their education is not disrupted. It is also
310		important that other children, adult students and school
311		and college staff are supported and protected as
312		appropriate.
313	10.43.	There is support available for schools and colleges.
314		Paragraph 52 and Annex A in the Sexual Violence and
315		Sexual Harassment Between Children in Schools and
316		Colleges advice provides detailed information and links to
317		resources.
318	10.44.	Staff should be aware that some groups are potentially
319		more at risk. Evidence shows girls, children with special
320		educational needs and disabilities (SEND) and LGBT
321		children are at greater risk.
322	10.45.	The fact that a child or a young person may be LGBT is
323		not in itself an inherent risk factor for harm. However,
324		children who are LGBT can be targeted by other children.
325		In some cases, a child who is perceived by other children
326		to be LGBT (whether they are or not) can be just as
327		vulnerable as children who identify as LGBT.
328	10.46.	Risks can be compounded where children/young people
329		who are LGBT lack a trusted adult with whom they can be
330		open. It is therefore vital that staff endeavour to reduce the
331		additional barriers faced, and provide a safe space for
332		them to speak out or share their concerns with members
333		of staff.
334	10.47.	LGBT inclusion is part of the statutory Relationships
335		Education, Relationship and Sex Education and Health
336		Education curriculum and there is a range of support

available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

10.48.

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. An umbrella term for these types of behaviour are often referred to as "**harmful sexual behaviour**". The term has been widely adopted in child protection. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context.

10.49.

Situations where children/young people are forced or coerced into sexual activity by peers or associates can be related with gang / serious youth violence activity but that is not always the case. Peer influence or peer pressure is a major factor in the decisions made by young people to join particular groups. Many young people see it as a "way out" from their day-to-day life and feel a strong bond with their peers, one which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying include:

- **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their



colour, ethnicity, culture, faith community, national origin or national status.

- **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender is used as a weapon by boys or girls, this may also include any of the following:
 - spreading rumors about someone's alleged sex life
 - using offensive terms to describe a person
 - inappropriate touching or attempts to do so
 - non-consensual sharing of sexual images and videos
 - unwanted sexual comments and messages, including those on social media
 - any sexual exploitation, coercion and threats
 - sexual assault and rape
- **Upskirting** - taking a picture under a person's clothing without their permission and /or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism Offences Act, which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.
- **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are transgender, thought to be transgender, or whose gender expression doesn't conform to traditional gender roles. Transphobia can prevent transgender and gender nonconforming people from living full lives free from harm.
- **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual orientation);
- **Disablist Bullying** - targets a young person solely based on their disability. This can include manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a certain aspect of the victim's disability.
- **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect attitude (usually negative) towards an individual based solely on the individual's membership of a social

group. For example, a person may hold prejudiced views towards a certain race or gender etc. (e.g. sexist).

- **Discrimination** is the behaviour or actions, usually negative, towards an individual or group of people, especially on the basis of sex/race/social class.

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

10.50.

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

10.51.

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

Opportunities to teach safeguarding

10.52.

Schools/colleges must ensure that their staff undergo regular updated safeguarding training, including online safety and for children to be taught about how to keep themselves and others safe, including online, that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.

10.53.

It should be recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children/young people, including those who are victims of abuse, and children/young people with special educational needs or disabilities.

10.54.

Whilst considering the above training requirements, governance boards and proprietor should have regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils. Also consider for Wales the EWC code of Professional Conduct and Practice.

10.55.

Schools and colleges play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism,

misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

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

10.57. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#). This includes teacher-training modules on the RSHE topics and non-statutory implementation guidance. Further guidance focused on teaching relationships education specifically to prevent sexual harassment and sexual violence will be published in Spring 2022. The following resources plus many more listed in [Annex B](#), may also help schools and colleges understand and teach about safeguarding:

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

10.58. Whilst it is essential that governance boards and proprietor ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does

not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding

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

Online safety

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

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

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

10.62. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include

considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the DSP and any parental engagement.

Online safety policy

10.63.

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

Remote Learning

10.64.

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

10.65.

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

Filters and monitoring

10.66.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governance boards and proprietor should be doing all that they reasonably can

569 to limit children's exposure to the above risks from the
570 school's or college's IT system. As part of this process,
571 governance boards and proprietor should ensure their
572 school or college has appropriate filters and monitoring
573 systems in place. Governance boards and proprietor
574 should consider the age range of their children, the number
575 of children, how often they access the IT system and the
576 proportionality of costs vs risks. Schools will work with the
577 internal Cambian/Care tech IT team and seek advice and
578 support required.

579 10.67. The appropriateness of any filters and monitoring systems
580 are a matter for individual schools and colleges and will be
581 informed in part, by the risk assessment required by the
582 [Prevent Duty](#). The UK Safer Internet Centre has published
583 guidance as to what "appropriate" filtering and monitoring
584 might look like UK Safer Internet Centre: [appropriate](#)
585 [filtering and monitoring](#).

586 Information security and access management

587 10.68. Education settings are directly responsible for ensuring
588 they have the appropriate level of security protection
589 procedures in place, in order to safeguard their systems,
590 staff and learners and review the effectiveness of these
591 procedures periodically to keep up with evolving cyber-
592 crime technologies. Guidance on e-security is available
593 from the National Education Network. In addition, broader
594 guidance on cyber security including considerations for
595 governors and trustees can be found at NCSC.GOV.UK.

596 Reviewing online safety

597 10.69. Technology, and risks and harms related to it evolve and
598 changes rapidly. Schools and colleges should consider
599 carrying out an annual review of their approach to online
600 safety, supported by an annual risk assessment that
601 considers and reflects the risks their children face. A free
602 online safety self-review tool for schools can be found via
603 the [360 safe website](#).

604 10.70. UKCIS has published [online safety in schools and](#)
605 [colleges: Questions from the governing board](#). The
606 questions can be used to gain a basic understanding of the
607 current approach to keeping learners safe online; learn
608 how to improve this approach where appropriate; and find
609 out about tools, which can be used to improve the
610 approach. It has also published an Online Safety Audit
611 Tool which helps mentors of trainee teachers and newly

612 qualified teachers induct mentees and provide ongoing
613 support, development and monitoring.

614 Cyberbullying

615 10.71. Central to Anti-bullying policy is the principle that 'bullying
616 is always unacceptable' and that 'all children/young people
617 have a right not to be bullied'. School/colleges also
618 recognises that it must take note of bullying perpetrated
619 outside school/college which spills over into the
620 school/college; therefore once aware services will respond
621 to any cyber-bullying we become aware of carried out by
622 children/young people when they are away from the site.

623 10.72. Cyber-bullying is defined as 'an aggressive, intentional act
624 carried out by a group or individual using electronic forms
625 of contact repeatedly over time against a victim who
626 cannot easily defend himself/herself.'

- 627 • By cyber-bullying, we mean bullying by electronic media:
- 628 • Bullying by texts or messages or calls on mobile 'phones
- 629 • The use of mobile 'phone cameras to cause distress, fear or humiliation
- 630 • Posting threatening, abusive, defamatory or humiliating material on websites,
631 to include blogs, personal websites, social networking sites
- 632 • Using e-mail to message others
- 633 • Hijacking/cloning e-mail accounts
- 634 • Making threatening, abusive, defamatory or humiliating remarks in on-line
635 forums

636 10.73. Cyber-bullying may be at a level where it is criminal in
637 character. It is unlawful to disseminate defamatory
638 information in any media including internet sites.

639 10.74. Section 127 of the Communications Act 2003 makes it an
640 offence to send, by public means of a public electronic
641 communications network, a message or other matter that
642 is grossly offensive or one of an indecent, obscene or
643 menacing character.

644 10.75. The Protection from Harassment Act 1997 makes it an
645 offence to knowingly pursue any course of conduct
646 amounting to harassment.

647 10.76. If services become aware of any incidents of cyberbullying,
648 they will need to consider each case individually as to any
649 criminal act that may have been committed. The services

650 will pass on information to the police if it feels that it is
651 appropriate or is required to do so.

652 **Gaming – raising awareness**

653 10.77. Online gaming is an activity in which the majority of
654 children and young people and many adults get involved.
655 The services will raise awareness by talking to
656 children/young people/key workers/staff and also where
657 appropriate parents/carers involved about the games their
658 children play and help them identify whether they are
659 appropriate.

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

661 10.78. Sexting is when someone shares sexual, naked or semi-
662 naked images or videos of themselves or others, or sends
663 sexually explicit messages. They can be sent using
664 mobiles, tablets, smartphones, and laptops - any device
665 that enables the sharing of media and messages. Sexting
666 may also be called: trading nudes, dirties, pic for pic.

667 10.79. Sexting can be seen as harmless, but creating or sharing
668 explicit images of a child is illegal, even if the person doing
669 it is a child. A young person is breaking the law if they:

- 670 • take an explicit photo or video of themselves or a friend
- 671 • share an explicit image or video of a child, even if it's shared between children
672 of the same age
- 673 • possess, download or store an explicit image or video of a child, even if the
674 child gave their permission for it to be created.

675 10.80. However, if a young person is found creating or sharing
676 images, the police can choose to record that a crime has
677 been committed but that taking formal action isn't in the
678 public interest. There are many reasons why a young

679 person may want to send a naked or semi-naked picture,
680 video or message to someone else:

- 681 • joining in because they think that ‘everyone is doing it’
- 682 • boosting their self-esteem
- 683 • flirting with others and testing their sexual identity
- 684 • exploring their sexual feelings
- 685 • to get attention and connect with new people on social media
- 686 • they may find it difficult to say no if somebody asks them for an explicit image,
687 especially if the person asking is persistent

688 10.81. The risks of sexting are that the young person has no
689 control over the images and how these are shared, and the
690 subsequent risks of blackmail, bullying and harm. In
691 response to this CaretechGroup will provide education and
692 guidance to prevent individuals from becoming victims of
693 such situations by encouraging them to think about the risk
694 of sexting and understand how to seek help when
695 approached to take part in sexting. More information can
696 be found on [Keeping-children-safe/online-safety/sexting-
697 sending-nudes](#).

698 Online reputation

699 10.82. Online reputation is the opinion others get of a person
700 when they encounter them on-line. It is formed by posts,
701 photos that have been uploaded and comments made by
702 others on people’s profiles. It is important that
703 children/young people and staff are aware that anything
704 that is posted could influence their future professional
705 reputation. The majority of organisations and work
706 establishments now check digital footprint before
707 considering applications for positions or places on
708 courses.

709 Grooming

710 10.83. On-line grooming is the process by which one person with
711 an inappropriate sexual interest in children/young people
712 will approach a child/young person on-line, with the
713 intention of developing a relationship with that child/young

714 person, to be able to meet them in person and intentionally
715 cause harm.

716 10.84. The services will build awareness amongst children/young
717 people, parents/carers and staff about ensuring that the
718 child/young person:

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

722 10.85. Where appropriate that the services will support
723 parents/carers to:

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

727 10.86. Where appropriate the services will raise awareness by:

- 728 • Regular communication with the families
- 729 • Schools/colleges will Include awareness around grooming as part of their
730 curriculum
- 731 • Identifying with the families and children/young people how they can be
732 safeguarded against grooming.

733 Violence against women and girls (VAWG)

734 10.87. Violence against women and girls (VAWG) is a hate crime
735 and a violation of the Human Rights of women and girls.
736 The government has a strategy looking at specific issues
737 that women and girls face.

738 10.88. It is also one of the most oppressive forms of gender
739 inequality and stands as a fundamental barrier to equal
740 participation of women and men in social, economic, and
741 political spheres. Such violence impedes gender equality
742 and the achievement of a range of development outcomes.
743 VAWG is a complex and multifaceted problem that cannot
744 effectively be addressed from a single vantage point. The
745 prevention of and response to such violence require
746 coordinated action across multiple sectors.

748 Female genital mutilation (FGM)

749 10.89. FGM comprises all procedures involving partial or total
750 removal of the external female genitalia or other injury to
751 the female genital organs for non-medical reasons, hence

752 interferes with the natural function of girls and women's
753 bodies. It has no health benefits and harms girls and
754 women in many ways.

755 10.90. The age at which girls undergo FGM varies enormously
756 according to the community in which they live. The
757 procedure may be carried out when the girl is new born,
758 during childhood or adolescence, just before marriage or
759 during the first pregnancy. However, the majority of cases
760 of FGM are thought to take place between the ages of 5 to
761 8 years and therefore girls within that age bracket are at a
762 higher risk.

763 10.91. In 2003, FGM became a criminal offence for UK nationals
764 or permanent UK residents to take their child abroad to
765 have female genital mutilation. Anyone found guilty of the
766 offence faces a maximum penalty of 14 years in prison. It
767 is mandatory for teachers to report known cases of FGM
768 to the police.

Forced marriage

770 10.92. In the case of children and young people: 'a forced
771 marriage is a marriage in which one or both spouses
772 cannot consent to the marriage and duress is involved.
773 Duress can include physical, psychological, financial,
774 sexual and emotional pressure.' In developing countries,
775 approx. 11% of girls are married before the age of 15. One
776 in 3 victims of forced marriage in the UK are under 18
777 years old.

778 10.93. It is important that all members of staff recognise the
779 presenting symptoms, know how to respond if there are
780 concerns and where to turn for advice.

781 10.94. Advice and help can be obtained nationally through the
782 **Forced Marriage Unit on +44 (0) 20 7008 0151** and
783 locally through the local police safeguarding team or
784 children's social care.

785 10.95. While all members of staff (education, care, clinical) have
786 important responsibilities with regard to children, young
787 people or adults who may be at risk of forced marriage,
788 managers and leaders should not undertake roles in this
789 regard that are most appropriately discharged by other
790 children's services professionals such as police officers or
791 social workers.

792 10.96. The Forced Marriage Unit (FMU) has created: Multi-
793 agency practice guidelines: handling cases of forced
794 marriage (pages 75-80 of which focus on the role of

schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>.

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

Breast ironing

10.97.

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

10.98.

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

Teenage relationship abuse

10.99.

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

10.100.

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

10.101.

Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their own,

their peers or others behaviour towards them. Therefore, significant effort will be made to raise awareness of it and respond effectively to such situations.

10.102.

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

Honour-based violence

10.103.

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. However, abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take” for example, honour-based violence might be committed against individuals who:

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

10.104.

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

10.105.

If staff believe that the Individual is at risk from honour-based violence, the DSP will follow the usual safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on teachers. It is important that if honour-based violence is known or suspected, communities and family members must NOT be contacted

881 prior to referral to the police or social care as this could
882 increase the risk to the individual.

883 Preventing extremism and radicalisation

884 10.106. All staff are fully aware of their duty in assessing the risk
885 of Individuals being drawn into terrorism including support
886 for terrorism ideology and extremist ideas. In accordance
887 with our **026. Preventing Extremism and Radicalisation**
888 **policy** and **0.27 E-safety policy**, we all need to be vigilant
889 in ensuring the safety from extremist and terrorist material
890 when accessing the internet. We consider Denbighshire
891 Local Authority Safeguarding Children's Board
892 arrangements to fulfil its Prevent duties.

893 10.107. Children are vulnerable to extremist ideology and
894 radicalisation. Similar to protecting children from other
895 forms of harms and abuse, protecting children from this
896 risk should be a part of a schools or colleges' safeguarding
897 approach.

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

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

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

909 10.108. There is no single way of identifying whether a child is
910 likely to be susceptible to an extremist ideology.
911 Background factors combined with specific influences
912 such as family and friends may contribute to a child's
913 vulnerability. Similarly, radicalisation can occur through
914 many different methods (such as social media or the
915 internet) and settings (such as within the home).

916 10.109. However, it is possible to protect vulnerable people from
917 extremist ideology and intervene to prevent those at risk of
918 radicalisation being radicalised. As with other
919 safeguarding risks, staff should be alert to changes in
920 children's behaviour, which could indicate that they may
921 be in need of help or protection. Staff should use their
922 judgement in identifying children who might be at risk of

923 radicalisation and act proportionately which may include
924 making a Prevent referral.

925 10.110. The school's or college's DSP (and any deputies) should
926 be aware of local procedures for making a Prevent referral

927 10.111. All schools and colleges are subject to a duty under section
928 26 of the Counter-Terrorism and Security Act 2015 (the
929 CTSA 2015), in the exercise of their functions, to have "due
930 regard to the need to prevent people from being drawn into
931 terrorism". This duty is known as **the Prevent duty**.

932 10.112. [An online general awareness-training module on Channel](#)
933 [is available](#). The module is suitable for school staff and
934 other front-line workers. It introduces the topics covered by
935 this advice, including how to identify factors that can make
936 people vulnerable to radicalisation, and case studies
937 illustrating the types of intervention that may be
938 appropriate, in addition to Channel.

Prevent Duty

939
940 10.113. The Prevent duty should be seen as part of schools and
941 colleges' wider safeguarding obligations. DSPs and other
942 senior leaders in schools should familiarise themselves
943 with the revised [Prevent duty guidance: for England and](#)
944 [Wales](#), especially paragraphs 57-76, which are specifically
945 concerned with schools (and also covers childcare). DSPs
946 and other senior leaders in colleges should familiar
947 themselves with the [Prevent duty guidance: for further](#)
948 [education institutions in England and Wales](#). The guidance
949 is set out in terms of four general themes: risk assessment,
950 working in partnership, staff training, and IT policies.

951 10.114. Local authorities will be expected to ensure appropriate
952 frontline staff, including those of its contractors, have a
953 good understanding of Prevent are trained to recognise
954 vulnerability to being drawn into terrorism and are aware
955 of available programmes to deal with this issue.

956 10.115. As the independent body responsible for standards and
957 quality improvement for further education, the Education
958 and Training Foundation will work with the sector to ensure
959 that appropriate training is available. This will include and

960 draw from training provided through the network of Prevent
961 co-ordinators.

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

963 10.116. This section of the policy must be read in conjunction with
964 our 0.29 Child Sexual Exploitation policy.

965 10.117. Both CSE and CCE are forms of abuse that occur where
966 an individual or group takes advantage of an imbalance in
967 power to coerce, manipulate or deceive a child into taking
968 part in sexual or criminal activity, in exchange for
969 something the victim needs or wants, and/or for the
970 financial advantage or increased status of the perpetrator
971 or facilitator and/or through violence or the threat of
972 violence. CSE and CCE can affect children, both male and
973 female and can include children who have been moved
974 (commonly referred to as trafficking) for the purpose of
975 exploitation.

976 **Child Criminal Exploitation (CCE)**

977 10.118. Some specific forms of CCE can include children being
978 forced or manipulated into transporting drugs or money
979 through county lines, working in cannabis factories,
980 shoplifting or pickpocketing. They can also be forced or
981 manipulated into committing vehicle crime or
982 threatening/committing serious violence to others.
983 Children can become trapped by this type of exploitation
984 as perpetrators can threaten victims (and their families)
985 with violence, or entrap and coerce them into debt. They
986 may be coerced into carrying weapons such as knives or
987 begin to carry a knife for a sense of protection from harm
988 from others. As children involved in criminal exploitation
989 often commit crimes themselves, their vulnerability as
990 victims is not always recognised by adults and
991 professionals, (particularly older children), and they are not
992 treated as victims despite the harm they have
993 experienced. They may still have been criminally exploited
994 even if the activity appears to be something they have
995 agreed or consented to.

996 10.119. It is important to note that the experience of girls who are
997 criminally exploited can be very different to that of boys.
998 The indicators may not be the same; however,
999 professionals should be aware that girls are at risk of
1000 criminal exploitation too. It is also important to note that

1001 both boys and girls being criminally exploited may be at
1002 higher risk of sexual exploitation.

1003 **Child Sexual Exploitation (CSE)**

1004 10.120. CSE is a form of child sexual abuse. Sexual abuse may
1005 involve physical contact, including assault by penetration
1006 (for example, rape or oral sex) or non-penetrative acts
1007 such as masturbation, kissing, rubbing, and touching
1008 outside clothing. It may include noncontact activities, such
1009 as involving children in the production of sexual images,
1010 forcing children to look at sexual images or watch sexual
1011 activities, encouraging children to behave in sexually
1012 inappropriate ways or grooming a child in preparation for
1013 abuse including via the internet.

1014 10.121. CSE can occur over time or be a one-off occurrence, and
1015 may happen without the child's immediate knowledge e.g.
1016 through others sharing videos or images of them on social
1017 media.

1018 10.122. CSE can affect any child, who has been coerced into
1019 engaging in sexual activities. This includes 16 and 17 year
1020 olds who can legally consent to have sex. Some children
1021 may not realise they are being exploited e.g. they believe
1022 they are in a genuine romantic relationship.

1023 10.123. Children with learning difficulties can be particularly
1024 vulnerable to exploitation as can children from particular
1025 groups, e.g. looked after children, young carers, children
1026 who have a history of physical, sexual emotional abuse or
1027 neglect or mental health problems; children who use drugs
1028 or alcohol, children who go missing from home or school,
1029 children involved in crime, children with parents/carers
1030 who have mental health problems, learning
1031 difficulties/other issues, children who associate with other
1032 children involved in exploitation. However, it is important to
1033 recognise that any child can be targeted.

1034 10.124. Whilst age may be the most obvious, this power imbalance
1035 can also be due to a range of other factors including
1036 gender, sexual identity, cognitive ability, physical strength,
1037 status, and access to economic or other resources. In
1038 some cases, the abuse will be in exchange for something
1039 the victim needs or wants and/or will be to the financial
1040 benefit or other advantage (such as increased status) of
1041 the perpetrator or facilitator.

1042 10.125. The abuse can be perpetrated by individuals or groups,
1043 males or females, and children (under the age of 18 years,
1044 including 16- and 17-year olds who can legally consent to

1045 have sex) or adults. It is critical to know that children/young
1046 people may also be exploited by other children/young
1047 people, who themselves may be experiencing exploitation
1048 – where this is the case, it is important that the child/young
1049 person perpetrator is also recognised as a victim.

1050 10.126. The abuse can be a one-off occurrence or a series of
1051 incidents over time, and range from opportunistic to
1052 complex organised abuse. It can involve force and/or
1053 enticement-based methods of compliance and may, or
1054 may not, be accompanied by violence or threats of
1055 violence. Victims can be exploited even when activity
1056 appears consensual and it should be noted exploitation as
1057 well as being physical can be facilitated and/or take place
1058 online.

- 1059 • appear with unexplained gifts or new professions;
- 1060 • associate with other young people involved in exploitation;
- 1061 • suffer from changes in emotional well-being;
- 1062 • misuse drugs and alcohol;
- 1063 • go missing for periods of time or regularly or come home late; and
- 1064 • regularly miss school or education or do not take part in education.

1065 10.127. Some additional specific indicators that may be present in
1066 CSE and children who:

- 1067 • Children who have older boyfriends or girlfriends; and
- 1068 • Children who suffer from sexually transmitted infections, display
1069 sexual behaviours beyond expected sexual development or become
1070 pregnant.

1071 10.128. Further information on signs of a child's involvement in
1072 sexual exploitation is available in Home Office guidance:
1073 Child sexual exploitation: guide for practitioners.

1074 10.129. As an organisation we do recognise that the same level of
1075 exploitation may take place involving vulnerable young
1076 people/adults at risk above the age of 18. An adult at risk
1077 is any person who is aged 18 years or over and at risk of
1078 abuse or neglect because of their needs for care and/or
1079 support (The Care Act 2014). As we do provide services
1080 for vulnerable young people/adults at risk, therefore it is

1081 expected that the above statement will equally apply to
1082 those who are 18+ across England and Wales.

1083 10.130. Children under the age of criminal responsibility (under the
1084 age of 10), or young people who have increased
1085 vulnerability due to push and pull factors who are
1086 manipulated, coerced or forced into criminal activity
1087 provide opportunity for criminals to distance themselves
1088 from crime.

1089 County Lines

1090 10.131. County lines is a term used to describe gangs and
1091 organised criminal networks involved in exporting illegal
1092 drugs using dedicated mobile phone lines or other form of
1093 "deal line". This activity can happen locally as well as
1094 across the UK - no specified distance of travel is required.
1095 Children and vulnerable adults are exploited to move,
1096 store and sell drugs and money. Offenders will often use
1097 coercion, intimidation, violence (including sexual violence)
1098 and weapons to ensure compliance of victims. Children
1099 can be targeted and recruited. Exploitation is an integral
1100 part of the county lines, children may become victims
1101 through: coercion, intimidation, violence (including sexual)
1102 and weapons.

1103 10.132. Children can be targeted and recruited into county lines in
1104 a number of locations including schools, further and higher
1105 educational institutions, pupil referral units, special
1106 educational needs schools, children's homes and care
1107 homes. Children are often recruited to move drugs and
1108 money between locations and are known to be exposed to
1109 techniques such as 'plugging', where drugs are concealed
1110 internally to avoid detection. Children can easily become
1111 trapped by this type of exploitation as county lines gangs
1112 create drug debts and can threaten serious violence and
1113 kidnap towards victims (and their families) if they attempt
1114 to leave the county lines network.

1115 10.133. Children are also increasingly being targeted and recruited
1116 online using social media. Children can easily become
1117 trapped by this type of exploitation as county lines gangs
1118 can manufacture drug debts which need to be worked off
1119 or threaten serious violence and kidnap towards victims
1120 (and their families) if they attempt to leave the county lines
1121 network. These children and young people are at serious
1122 risk of criminalisation, sexual exploitation and exposure to
1123 violence. This is facilitated by a group who may not
1124 necessarily be affiliated to a gang, but who have

1125 developed networks across geographical boundaries to
1126 access and exploit existing drugs markets in these areas.

1127 10.134. The group, or individuals exploited by them, travel
1128 regularly between the urban hub and the rural
1129 marketplace, to replenish stock and deliver cash. This
1130 movement is not unique to county lines drug supply but is
1131 generally more frequent and in smaller deal amounts
1132 compared to most other drug supply methods.

1133 10.135. A number of the indicators for CSE and CCE as detailed
1134 above may be applicable to where children are involved in
1135 county lines. Some additional specific indicators that may
1136 be present where a child is criminally exploited through
1137 involvement in county lines are children who:

- 1138 • go missing and are subsequently found in areas away from their home;
- 1139 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 1140 • are involved in receiving requests for drugs via a phone line, moving
1141 drugs, handing over and collecting money for drugs;
- 1142 • are exposed to techniques such as ‘plugging’, where drugs are concealed
1143 internally to avoid detection;
- 1144 • are found in accommodation that they have no connection with, often
1145 called a ‘trap house or cuckooing’ or hotel room where there is drug
1146 activity;
- 1147 • owe a ‘debt bond’ to their exploiters;
- 1148 • have their bank accounts used to facilitate drug dealing.

1149 10.136. If a child is suspected to be at risk of or involved in county
1150 lines, a safeguarding referral should be considered
1151 alongside consideration of availability of local
1152 services/third sector providers who offer support to victims
1153 of county lines exploitation.

1154 10.137. Further information on the signs of a child’s involvement in
1155 county lines is available in guidance published by the
1156 [Home Office and The Children’s Society County Lines
1157 Toolkit for Professional](#).

Cuckooing

1159 10.138. This is the exploitation of young people that might be
1160 vulnerable is a common feature in the facilitation of county
1161 lines drugs supply, whether for the storage or supply of
1162 drugs, the movement of cash, or to secure the use of

1163 dwellings held by vulnerable people in the rural
1164 marketplace - commonly referred to as cuckooing.

1165 10.139. Cuckooing is a form of crime in which drug dealers take
1166 over the home of a vulnerable person in order to use it as
1167 a base for drug dealing. As of the 2010s, cuckooing is
1168 becoming an increasingly common problem in the South
1169 of England. The crime is named for the cuckoo's practice
1170 of taking over other birds' nests for its young.

1171 10.140. The group is inclined to use intimidation, violence and
1172 weapons, including knives, corrosives and firearms.

1173 10.141. Additional to the list under Serious Violent Crime section,
1174 other indicators that a child may be criminally exploited
1175 include:

- 1176 ■ Increase in missing episodes (Education and/or Care) – particular
1177 key as children/young people can be missing for days and drug
1178 run in other counties
- 1179 ■ Having unexplained amounts of money, new high cost items and
1180 multiple mobile phones
- 1181 ■ Increased social media and phone/text use, almost always
1182 secretly
- 1183 ■ Older males in particular seen to be hanging around and driving
- 1184 ■ Having injuries that are unexplained and unwilling to be looked at
- 1185 ■ Increase in aggression, violence and fighting
- 1186 ■ Carrying weapons – knives, baseball bats, hammers, acid
- 1187 ■ Travel receipts that are unexplained
- 1188 ■ Significant missing cases from education and disengaging from
1189 previous positive peer groups
- 1190 ■ Parents/carers concerns and significant changes in behaviour
1191 that affect emotional wellbeing

1192 10.142. We will treat any child/young person who may be criminally
1193 exploited as a victim in the first instance and refer to the
1194 Local Safeguarding Authority in the first instance. If a
1195 referral to the police is also required as crimes have been
1196 committed on the school premises, these will also be
1197 made.

Knife crime

1199 10.143. Ofsted report [Knife crime safeguarding children and young](#)
1200 [people \(Lessons from London\)](#) makes references to both;

1201		to the use of knives against children either to threaten or
1202		to wound them and to instances when children may have
1203		been carrying or using knives for a range of purposes.
1204	10.144.	Knife crime is a term used commonly in the media to refer,
1205		primarily, to street-based knife assaults and knife-carrying.
1206		However, there are many different criminal offences
1207		relating to knives. For example:
1208		• it is an offence to threaten or cause harm to a person with a bladed
1209		weapon
1210		• some bladed weapons are prohibited from being sold or purchased,
1211		including to anyone under the age of 18
1212		• offences such as robbery or assault can be aggravated if a knife is
1213		involved
1214		• it is also an offence to carry a knife in a public place without good
1215		reason.
1216		• It is clear that knife crime is an increasing safeguarding risk to children
1217		and young people, both at school and in their local communities.
1218		While Ofsted have not sought to answer the question of the causes of
1219		knife crime, leaders told Ofsted that, in their experience, children are
1220		in three categories of risk of knife carrying.
1221	10.145.	The highest level of risk is for those children who have
1222		been groomed into gangs, for the purposes of criminal
1223		exploitation.
1224	10.146.	Underneath this lies a group of children who have
1225		witnessed other children carrying knives, have been the
1226		victim of knife crime or know someone who has carried a
1227		knife for protection or status-acquisition or who are
1228		encouraged to believe knife-carrying is normal through the
1229		glamorisation of gangs and knives on social media.
1230	10.147.	Then there are children who carry knives to school as an
1231		isolated incident. For example, they may carry a penknife
1232		that a grandparent has gifted them
1233	10.148.	It is important to remember that knife crime does not exist
1234		in a vacuum and children who are victims or perpetrators
1235		may also be experiencing multiple vulnerabilities.
1236	10.149.	Some children and young people can be more at risk of
1237		being drawn into criminality; multiple studies demonstrate
1238		a clear link between inequality and high rates of violence
1239		for example. There is a need to both understand and
1240		address individual risk factors as well as address the social
1241		challenges that underpin criminal exploitation and serious

1242 violence in our communities, from poor mental health,
1243 addiction, poverty, unemployment and poor-quality
1244 housing.

Missing young people and the link between missing and county lines

1246 10.150. Every precaution is taken through the use of risk
1247 assessments and thorough planning and supervision to
1248 ensure that children, young people and young adults are
1249 safe both at school, college, home, and on outings. If a
1250 child, young person or young adult goes missing from our
1251 Location, it is considered a potential indicator of abuse or
1252 neglect.

1253 10.151. Our staff members must follow our **0.23. Missing from**
1254 **Care and Education policy** in the event of someone
1255 going missing. All homes/schools/colleges must inform the
1256 LA of any student who fails to attend school regularly or
1257 has been absent without the school's permission for a
1258 continuous period of 10 days or more or as such intervals
1259 agreed with the Local Authority. It is essential that all staff
1260 are alert to signs such as travelling to conflict zones, FGM
1261 and forced marriage.

1262 10.152. Coercion and manipulation often increase a young
1263 person's vulnerability to exploitation, pushing them
1264 towards going missing and becoming involved in criminal
1265 activities. Some individuals may be pulled towards
1266 exploitation through the promise of money, gifts, affection
1267 and status. However, they may be then be forced to work
1268 for these people as they are coerced into believing that
1269 they are indebted to them.

Domestic abuse

1270
1271 10.153. The Domestic Abuse Act 2021 received Royal Assent on
1272 29 April 2021. The Act introduces the first ever statutory
1273 definition of domestic abuse and recognises the impact of
1274 domestic abuse on children, as victims in their own right, if
1275 they see, hear or experience the effects of abuse. The
1276 statutory definition of domestic abuse, based on the
1277 previous cross-government definition, ensures that
1278 different types of relationships are captured, including ex-
1279 partners and family members. The definition captures a
1280 range of different abusive behaviours, including physical,
1281 emotional and economic abuse and coercive and
1282 controlling behaviour. Both the person who is carrying out
1283 the behaviour and the person to whom the behaviour is
1284 directed towards must be aged 16 or over and they must

1285		be “personally connected” (as defined in section 2 of the
1286		2021 Act).
1287	10.154.	Types of domestic abuse include intimate partner violence,
1288		abuse by family members, teenage relationship abuse and
1289		child/adolescent to parent violence and abuse. Anyone
1290		can be a victim of domestic abuse, regardless of gender,
1291		age, ethnicity, socioeconomic status, sexuality or
1292		background and domestic abuse can take place inside or
1293		outside of the home.
1294	10.155.	All children can witness and be adversely affected by
1295		domestic abuse in the context of their home life where
1296		domestic abuse occurs between family members.
1297		Experiencing domestic abuse and/or violence can have a
1298		serious, long lasting emotional and psychological impact
1299		on children. In some cases, a child may blame themselves
1300		for the abuse or may have had to leave the family home as
1301		a result.
1302	10.156.	Young people can also experience domestic abuse within
1303		their own intimate relationships. This form of abuse is
1304		sometimes referred to as ‘teenage relationship abuse’.
1305		Depending on the age of the young people, this may not
1306		be recognised in law under the statutory definition of
1307		‘domestic abuse’ (if one or both parties are under 16).
1308		However, as with any child under 18, where there are
1309		concerns about safety or welfare, child safeguarding
1310		procedures should be followed and both young victims and
1311		young perpetrators should be offered support.
1312	10.157.	Keeping Learners Safe introduces additional information
1313		about domestic abuse which can encompass a wide range
1314		of behaviours and may be a single incident or a pattern of
1315		incidents. That abuse can be, but is not limited to,
1316		psychological, physical, sexual, financial or emotional.
1317		Children can be victims of domestic abuse. They may see,
1318		hear, or experience the effects of abuse at home and/or
1319		suffer domestic abuse in their own intimate relationships
1320		(teenage relationship abuse). All of which can have a
1321		detrimental and long-term impact on their health, well-
1322		being, development, and ability to learn.
1323	10.158.	Operation Encompass is a partnership between police
1324		and schools, and it is now in place in all 43 police forces in
1325		England and Wales: Operation Encompass: supporting
1326		children and young people exposed to domestic
1327		abuse (naht.org.uk) . It helps police and schools work
1328		together to provide emotional and practical help to
1329		children. The system ensures that when police are called
1330		to an incident of domestic abuse, where there are children

1331		in the household who have experienced the domestic
1332		incident, the police will inform the key adult (usually the
1333		DSP) in school before the child or children arrive at school
1334		the following day. This ensures that the school has up to
1335		date relevant information about the child's circumstances
1336		and can enable immediate support to be put in place,
1337		according to the child's needs. Operation Encompass
1338		does not replace statutory safeguarding procedures.
1339		Where appropriate, the police and/or schools should make
1340		a referral to children's social care if they are concerned
1341		about a child's welfare. More information about the
1342		scheme and how schools can become involved is
1343		available on the Operation Encompass website.
1344	10.159.	Operation Encompass provides an advice and helpline
1345		service for all staff members from educational settings who
1346		may be concerned about children who have experienced
1347		domestic abuse. The helpline is available 8AM to 1PM,
1348		Monday to Friday on 0204 513 9990 (charged at local
1349		rate).
1350	10.160.	Refuge runs the National Domestic Abuse Helpline, which
1351		can be called free of charge and in confidence, 24 hours a
1352		day on 0808 2000 247. Its website provides guidance and
1353		support for potential victims, as well as those who are
1354		worried about friends and loved ones. It also has a form
1355		through which a safe time from the team for a call can be
1356		booked. Additional advice on identifying children who are
1357		affected by domestic abuse and how they can be helped
1358		is available at:
1359		<ul style="list-style-type: none"> • NSPCC- UK domestic-abuse Signs Symptoms Effects
1360		<ul style="list-style-type: none"> • Refuge what is domestic violence/effects of domestic violence on children
1361		
1362		<ul style="list-style-type: none"> • SafLives: young people and domestic abuse.
1363		<ul style="list-style-type: none"> • Domestic abuse: specialist sources of support - GOV.UK
1364		(www.gov.uk) (includes information for adult victims, young people

1365 facing abuse in their own relationships and parents experiencing child
1366 to parent violence/abuse)

- 1367 • Home : [Operation Encompass](#) (includes information for schools on
1368 the impact of domestic abuse on children

Serious Violent Crime

1370 10.161. All staff should be aware of indicators, which may signal
1371 that children are at risk from, or are involved with serious
1372 violent crime. These may include:

- 1373 • increased absence from school with a significant decline in
1374 performance,
- 1375 • a change in friendships or relationships with older individuals or
1376 group,
- 1377 • signs of self-harm or a significant change in well-being, or signs
1378 of assault or unexplained injuries,
- 1379 • unexplained gifts or new possessions could also indicate that
1380 children have been approached by, or are involved with
1381 individuals associated with criminal networks or gangs.

1382 10.162. All staff should be aware of the associated risks and
1383 understand the measures in place to measure these.
1384 Advice for schools and colleges is provided in the Home
1385 Office's Preventing youth violence and gang involvement
1386 and its [criminal exploitation of children and vulnerable
1387 adults: County Lines guidance - September 2018](#).

Mental Health

1389 10.163. Schools, colleges and homes have an important role to
1390 play in supporting the mental health and wellbeing of
1391 young people. All staff should be aware that mental health
1392 problems can, in some cases, be an indicator that a child
1393 has suffered or is at risk of suffering abuse, neglect or
1394 exploitation.

1395 10.164. Schools/colleges and homes need to ensure they have
1396 clear systems and processes in place for identifying
1397 possible mental health problems, including routes to
1398 escalate and clear referral and accountability systems.

1399 10.165. The Department is providing funding to support costs of a
1400 significant training program for senior mental health leads
1401 and the national rollout of the [Link Program](#). Training for
1402 senior mental health leads, will be available to all state-
1403 funded schools and colleges by 2025, to help introduce or

1404		develop their whole school or college approach to mental
1405		health.
1406	10.166.	Only appropriately, trained professionals should attempt to
1407		make a diagnosis of a mental health problem. Staff
1408		however, are well placed to observe children day-to-day
1409		and identify those whose behaviour suggests that they
1410		may be experiencing a mental health problem or be at risk
1411		of developing one. If staff suspect this might be the case
1412		they should report their concerns to a senior leader within
1413		the school and if possible bring their concerns to a member
1414		of the clinical team.
1415	10.167.	Where children have suffered abuse and neglect, or other
1416		potentially traumatic adverse childhood experiences, this
1417		can have a lasting impact throughout childhood,
1418		adolescence and into adulthood. It is key that staff receive
1419		appropriate education and training so that they are aware
1420		of how these children's experiences, can impact on their
1421		mental health, behaviour and education.
1422	10.168.	If staff have a mental health concern about a child that is
1423		also a safeguarding concern, immediate action should be
1424		taken. Staff should follow their child protection policy and
1425		speak immediately to the DSP or a deputy.
1426	10.169.	Schools and colleges can access a range of advice to help
1427		them identify children in need of extra mental health
1428		support; this includes working with external agencies.
1429		More information can be found in the mental health and
1430		behaviour in schools guidance , colleges may also wish to
1431		follow this guidance as best practice. Public Health
1432		England has produced a range of resources to support
1433		secondary school teachers to promote positive health,
1434		wellbeing and resilience among children.
1435	10.170.	The DfE has published advice and guidance on Preventing
1436		and Tackling Bullying (which may also be useful for
1437		colleges). The Promoting and supporting mental health
1438		and wellbeing in Schools sets out how schools and
1439		colleges can help prevent mental health problems by
1440		promoting resilience as part of an integrated, whole
1441		school/college approach to social and emotional
1442		wellbeing, which is tailored to the needs of their pupils.
1443	10.171.	In addition, Public Health England has produced a range
1444		of resources to support secondary schools to promote
1445		positive health, wellbeing and resilience among children
1446		including its guidance Promoting children and young
1447		people's emotional health and wellbeing. Its resources
1448		include social media, forming positive relationships,

1449 smoking and alcohol. See [Rise Above](#) for links to all
1450 materials and lesson plans. The Department has also
1451 published, '[Every interaction matters](#)', a pre-recorded
1452 webinar which provides staff with a simple framework for
1453 promoting wellbeing, resilience, and mental health. This
1454 sits alongside our [Wellbeing for education recovery](#)
1455 [program](#) content, which covers issues such as
1456 bereavement, loss, anxiety, stress and trauma.

Human trafficking

1457
1458 10.172. Human trafficking is defined by the UNHCR in respect of
1459 children/young people/young adults as a process that is a
1460 combination of:

- 1461 - Movement (including within the UK);
- 1462 - Control, through harm / threat of harm or fraud
- 1463 - For the purpose of exploitation

1464 10.173. Traffickers and slave drivers trick, force and/or persuade
1465 individuals to leave their homes. Grooming methods are
1466 used to gain the trust of a person first, e.g. the promise of
1467 a better life, which results in a life of abuse, servitude and
1468 inhumane treatment.

1469 10.174. Any individual transported for exploitative reasons is
1470 considered to be a trafficking victim. There is significant
1471 evidence that children/young people/young adults (both of
1472 UK and other citizenship) are being trafficked internally
1473 within the UK and this is regarded as a more common form
1474 of trafficking in the UK.

1475 10.175. There are a number of indicators which suggest that a
1476 child/young person/young adult may have been trafficked

1477 into the UK, and may still be controlled by the traffickers or
1478 receiving adults. These are as follows:

- 1479 - Shows signs of physical or sexual abuse, and/or has contracted
1480 a sexually transmitted infection or has an unwanted pregnancy
- 1481 - Has a history with missing links and unexplained moves
- 1482 - Is required to earn a minimum amount of money every day
- 1483 - Works in various locations
- 1484 - Has limited freedom of movement
- 1485 - Appears to be missing for periods
- 1486 - Is known to beg for money
- 1487 - Is being cared for by adult/s who are not their parents and the
1488 quality of the relationship between the child and their adult carers
1489 is not good
- 1490 - Is one among a number of unrelated children found at one
1491 address
- 1492 - Has not been registered with or attended a GP practice
- 1493 - Is excessively afraid of being deported.

1494 10.176. For those children/young people/young adults who are
1495 internally trafficked within the UK indicators include:

- 1496 - Physical symptoms (bruising indicating either physical or sexual
1497 assault)
- 1498 - Prevalence of a sexually transmitted infection or unwanted
1499 pregnancy
- 1500 - Reports from reliable sources suggesting the likelihood of
1501 involvement in
- 1502 - Sexual exploitation / the child has been seen in places known to
1503 be used for sexual exploitation
- 1504 - Evidence of drug, alcohol or substance misuse
- 1505 - Being in the community in clothing unusual for a child i.e.
1506 inappropriate for age, or borrowing clothing from older people
- 1507 - Relationship with a significantly older partner
- 1508 - Accounts of social activities, expensive clothes, mobile phones or
1509 other possessions with no plausible explanation of the source of
1510 necessary funding

- 1511 - Persistently missing, staying out overnight or returning late with
1512 no plausible explanation
- 1513 - Returning after having been missing, looking well cared for
1514 despite having not been at home
- 1515 - Having keys to premises other than those known about
- 1516 - Low self- image, low self-esteem, self-harming behaviour
1517 including cutting, overdosing, eating disorder, promiscuity
- 1518 - Truancy / disengagement with education
- 1519 - Entering or leaving vehicles driven by unknown adults
- 1520 - Going missing and being found in areas where the child/young
1521 person/young adult has no known links; and/or
- 1522 - Possible inappropriate use of the internet and forming on-line
1523 relationships, particularly with adults/other adults.
- 1524 10.177. These behaviours themselves do not indicate that an
1525 Individual is being trafficked, but should be considered as
1526 indicators that this may be the case.

Child abduction and community safety incidents

- 1527
- 1528 10.178. Child abduction is the unauthorised removal or retention of
1529 a minor from a parent or anyone with legal responsibility
1530 for the child. Child abduction can be committed by parents
1531 or other family members; by people known but not related
1532 to the victim (such as neighbours, friends and
1533 acquaintances); and by strangers. Other community safety
1534 incidents in the vicinity of a school can raise concerns
1535 amongst children and parents, for example, people
1536 loitering nearby or unknown adults engaging children in
1537 conversation.
- 1538 10.179. As children get older and are granted more independence
1539 (for example, as they start walking to school on their own),
1540 it is important they are given practical advice on how to
1541 keep themselves safe. Many schools provide outdoor-
1542 safety lessons run by teachers or by local police staff. It is
1543 important that lessons focus on building children's
1544 confidence and abilities rather than simply warning them
1545 about all strangers. Further information is available at:
1546 <http://www.actionagainstabduction.org/>and
1547 <https://clevernevergoes.org/>

Modern slavery and the National Referral Mechanism

- 1548
- 1549 10.180. Modern slavery encompasses human trafficking and
1550 slavery, servitude and forced or compulsory labour.

1551 Exploitation can take many forms, including: sexual
1552 exploitation, forced labour, slavery, servitude, forced
1553 criminality and the removal of organs.

1554 10.181. When considering modern slavery, there is a perception
1555 that this is taking place overseas. The government
1556 estimates that tens of thousands of slaves are in the UK
1557 today.

1558 10.182. Young people are being forced to work in restaurants, nail
1559 bars, car washes and harvesting fruit, vegetables or other
1560 foods have all been slaves 'hiding in plain sight' within the
1561 U.K and rescued from slavery. Other forms of slavery such
1562 as sex slaves or household slaves are more hidden but
1563 have also been rescued within the UK.

1564 10.183. If staff believe that a child/young person/young adult is
1565 being trafficked or is a slave, this must be reported to the
1566 DSP/RM/Head of Service for referral to be considered to
1567 local Safeguarding Authority.

1568 10.184. Further information on the signs that someone may be a
1569 victim of modern slavery, the support available to victims
1570 and how to refer them to the NRM is available in the
1571 Modern Slavery Statutory Guidance. Modern slavery: how
1572 to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

1574 10.185. Cybercrime is criminal activity committed using computers
1575 and/or the internet. It is broadly categorised as either
1576 'cyber-enabled' (crimes that can happen off-line but are
1577 enabled at scale and at speed on-line) or 'cyber

1578 dependent' (crimes that can be committed only by using a
1579 computer). Cyber-dependent crimes include:

- 1580 • unauthorised access to computers (illegal 'hacking'), for example
1581 accessing a school's computer network to look for test paper answers or
1582 change grades awarded;
- 1583 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts
1584 to make a computer, network or website unavailable by overwhelming it
1585 with internet traffic from multiple sources; and
- 1586 • making, supplying or obtaining malware (malicious software) such as
1587 viruses, spyware, ransomware, botnets and Remote Access Trojans with
1588 the intent to commit further offence, including those above.

1589 10.186. Children with particular skill and interest in computing and
1590 technology may inadvertently or deliberately stray into
1591 cyber-dependent crime.

1592 10.187. If there are concerns about a child in this area, the DSP (or
1593 a deputy), should consider referring into the Cyber
1594 Choices programme. This is a nationwide police
1595 programme supported by the Home Office and led by the
1596 National Crime Agency, working with regional and local
1597 policing. It aims to intervene where young people are at
1598 risk of committing, or being drawn into, low level cyber-
1599 dependent offences and divert them to a more positive use
1600 of their skills and interests.

1601 10.188. Note that Cyber Choices does not currently cover 'cyber-
1602 enabled' crime such as fraud, purchasing of illegal drugs
1603 on-line and child sexual abuse and exploitation, nor other
1604 areas of concern such as on-line bullying or general on-
1605 line safety. Additional advice can be found at: [Cyber](#)
1606 [Choices](#), ['NPCC- When to call the Police'](#) and [National](#)
1607 [Cyber Security Centre - NCSC.GOV.UK](#)

Initiation/Hazing

1609 10.189. Hazing is a form of initiation ceremony, which is used to
1610 induct newcomers into an organisation such as a private
1611 school, sports team etc. There are a number of different
1612 forms, from relatively mild rituals to severe and sometimes
1613 violent ceremonies in gangs/criminal groups.

1614 10.190. The idea behind this practice is that it welcomes
1615 newcomers by subjecting them to a series of trials, which
1616 promote a bond between them. After the hazing is over,
1617 the newcomers also have something in common with older
1618 members of the organisation, because they all
1619 experienced it as part of a rite of passage. Many rituals

1620 involve humiliation, embarrassment, abuse, and
1621 harassment.

1622 10.191. CaretechGroup will provide education to prevent
1623 individuals from becoming victims of such behaviour and
1624 raise awareness of such within all services.
1625

Safeguarding issues relating to Individual children and young people needs

Homelessness

1629 10.192. As an organisation we recognise that being homeless or
1630 being at risk of becoming homeless presents a real risk to
1631 a child's/young person welfare. The impact of losing a
1632 place of safety and security can affect an Individual's
1633 behaviour and attachments. DSP will work with Local
1634 Authorities to raise/progress concerns at the earliest
1635 opportunity.

1636 10.193. In line with the Homelessness Reduction Act 2017 they will
1637 also promote links into the Local Housing Authority for the
1638 parent/guardians in order to raise/progress concerns.

1639 10.194. In most cases school and college, colleagues will be
1640 considering homelessness in the context of children who
1641 live with their families, and intervention will be on that
1642 basis. However, it should also be recognised in some
1643 cases 16 and 17 year olds could be living independently
1644 from their parents or guardians, for example through their
1645 exclusion from the family home, or other reasons. This will
1646 require a different level of intervention and support.
1647 Children's services will be the lead agency for these young
1648 people and the DSP (or a deputy) should ensure
1649 appropriate referrals are made based on the child's
1650 circumstances. The department and the Ministry of
1651 Housing, Communities and Local Government have
1652 published joint statutory guidance on the provision of
1653 accommodation for 16 and 17 year olds who may be
1654 homeless and/or require accommodation: [Homelessness
1655 Reduction Act: policy factsheets.](#)

1656 10.195. Guidance on how local authorities should exercise their
1657 homelessness functions in accordance with the
1658 Homelessness Reduction Act 2017 from 3 April 2018-
1659 [Homelessness code of guidance for local authorities.](#)

1660 10.196. Children's services (Adult's services where the person is
1661 18 +) will be the lead agency for these young people and

1662 the DSP should ensure appropriate referrals are made
1663 based on the Individual's circumstances.

1664 10.197. It is recognised that whilst referrals and/or discussion with
1665 the Local Housing Authority should be progressed as
1666 appropriate, this does not, and should not, replace a
1667 referral into the Local Safeguarding Authority where an
1668 Individual has been harmed or is at risk of harm.

Private Fostering

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1670 10.198. Private fostering is an arrangement by a child's parents for
1671 their child (under 16 or 18 if disabled) to be cared for by
1672 another adult who is not closely related and is not a legal
1673 guardian with parental responsibility for 28 days or more.

1674 10.199. It is not private fostering if the carer is a close relative to
1675 the child such as grandparent, brother, sister, uncle or
1676 aunt.

1677 10.200. The Law requires that the carers and parents must notify
1678 the Children's Services Department of any private
1679 fostering arrangement.

1680 10.201. If the school/college/children's home/care homes (16-18)
1681 becomes aware that a child/young person is being
1682 privately fostered they will inform the Children's Services
1683 Department and inform both the parents and carers that
1684 they have done so.

Child and the Court System

1685
1686 10.202. As an organisation we recognise that children/young
1687 people are sometimes required to give evidence in criminal
1688 courts, either for crimes committed against them or for
1689 crimes, they have witnessed. We know that this can be a
1690 stressful experience and therefore services across the
1691 organisation will aim to support children through this
1692 process.

1693 10.203. Along with information, advice and guidance, services will
1694 use age-appropriate materials published by HM Courts
1695 and Tribunals Services (2017) [Going to court](#) explain to
1696 children/young people what it means to be a witness, how
1697 to give evidence and the special measures which are in
1698 place to assist such as using a live link/aids to
1699 communicate and video links.

1700 10.204. We recognise that making child arrangements via the
1701 family courts following separation can be stressful and
1702 entrench conflict in families. This can be very stressful for

1703		children. Services will support children/young people going
1704		through this process.
1705	10.205.	Alongside information, advice and guidance services will
1706		use online materials published by The Ministry of Justice
1707		(2018) which offers children/young people information &
1708		advice on the dispute resolution service - Get help with
1709		child arrangements . These materials will also be offered to
1710		parents and carers if appropriate.
1711	10.206.	Ensure that children/young people are sufficiently
1712		supported where a parent has been sent to prison;
1713		adequate support includes protection from stigma,
1714		isolation and poor mental health.
1715		Fabricated or induced illnesses (FII)
1716	10.207.	Fabricated or induced illness (FII) is a rare form of child
1717		abuse. It occurs when a parent or carer, usually the child's
1718		biological mother, exaggerates or deliberately causes
1719		symptoms of illness in the child.
1720	10.208.	FII is also known as "Munchausen's syndrome by proxy"
1721		(not to be confused with Munchausen's syndrome, where
1722		a person pretends to be ill or causes illness or injury to
1723		themselves).
1724	10.209.	FII covers a wide range of symptoms and behaviours
1725		involving parents seeking healthcare for a child. This

1726 ranges from extreme neglect (failing to seek medical care)
1727 to induced illness.

1728 10.210. Behaviours in FII include a parent/carer who:

- 1729 • persuades healthcare professionals that their child is ill when they're
1730 perfectly healthy,
- 1731 • exaggerates or lies about their child's symptoms,
- 1732 • manipulates test results to suggest the presence of illness – for example, by
1733 putting glucose in urine samples to suggest the child has diabetes,
- 1734 • deliberately induces symptoms of illness – for example, by poisoning her
1735 child with unnecessary medication or other substances.
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