



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

Cambian Dunbroch School ⁴

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92 **1. Monitoring and review**

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

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

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

100 Signed:



Mick Coleman
Director, Childrens Services
June 2025

Karen  Carrington

Headteacher
September 2023

101

102 2. Terminology

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

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'Establishment' or 'Location'	This is a generic term which means the School
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Cambian Dunbroch School we have children and young people attending our school between the ages of 12-18
Head of Service	This is the senior person with overall responsibility for the School – The Headteacher
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	Means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the individual's family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Safeguarding Authority	Children's Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England
LADO	Local Authority Designated Officer
DSL/DSL Deputy	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
Cambian KPI	The online in-house information system which holds data for each site on quality measures.

0 3. Definitions and age related arrangements

- 1 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies to
 2 children and young people until they reach the age of 18, Keeping Children Safe in Education (2022) now
 3 applies to providers of post 16 education as set out in Education and Training (Welfare of Children) Act
 4 2021.
- 5 3.2. **Adults are over the age of 18.** Over 18-year-olds are covered by the Local Safeguarding Adult Boards
 6 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse
 7 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and
 8 as a result of their particular care and support needs, is unable to protect themselves from either the risk
 9 of, or the experience of abuse or neglect'. We refer to adult service users in our provision as **young adults**
 10 due to the fact we provide children's services up to the age of 25.

11 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in
12 April 2016 and it provides the legal framework for social service provision in Wales. It sets out what must
13 and should be done to

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

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

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

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

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

141 3.7. Children Social Care - provide support to children in need of help and protection, including children with 142 disabilities. Services include statutory assessment and care planning for children at risk of significant 143 harm, provision for cared for children and care experienced young people, as well as fostering and 144 adoption services.

145 3.8. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing 146 bodies and proprietors should ensure that the school contributes to multi-agency working in line with 147 statutory guidance [Working Together to Safeguard Children](#).

148 3.9. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area 149 within the local authority and the chief officer of police for an area (any part of which falls) within the 150 local authority area made arrangements to work together with appropriate relevant agencies to 151 safeguard and promote the welfare of local children, including identifying and responding to their needs.

152 3.10. It is especially important that schools and colleges understand their role in the three safeguarding partner 153 arrangements. Governing bodies, proprietors and their senior leadership teams, especially their DSLs, 154 should make themselves aware of and follow their local arrangements.

155 3.11. The three safeguarding partners should make arrangements to allow all schools and colleges in the local 156 area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, 157 the three safeguarding partners will name schools and colleges as relevant agencies and will reach their 158 own conclusions on the best way to achieve the active engagement with individual institutions in a 159 meaningful way.

160 **Child protection definition**

161 3.12. Child protection is part of the safeguarding process. It focuses on protecting individual children identified 162 as suffering or likely to suffer significant harm. This includes child protection procedures which detail how 163 to respond to concerns about a child.

164 **Safeguarding definition – Working together to safeguarding children 2018**

165 3.13. **Safeguarding children and young people** is the action that is taken to promote the welfare of children 166 and protect them from harm. It means:

- 167
- Protecting children from abuse and maltreatment,
- 168
- Preventing harm to children's health or development,

- 169 • Ensuring children grow up with the provision of safe and effective care,
170 • Taking action to enable all children and young people to have the best outcomes.

171 Safeguarding definition – Keeping Children Safe in Education 2022

172 3.14. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes 173 into contact with children and their families has a role to play. In order to fulfil this responsibility 174 effectively, all practitioners should make sure their approach is child-centred. This means that they should 175 consider, at all times, what is in the best interests of the child.

176 3.15. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: 177

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

182 Safeguarding Adults

183 3.16. Safeguarding Adults means protecting an adult’s right to live in safety, free from abuse and neglect.

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

187 3.17. The statutory guidance enshrines the **six principles** of adults safeguarding:

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

195 3.18. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and
196 procedures which apply to its Adults’ Services. Both policies can be accessed via Rezure.

197 3.19. In relation to children’s services - in practice safeguarding is the policies and practices that 198 schools/colleges/children’s homes employ to keep children safe and promote their well-being. This 199 means everything from security of the buildings, to the safe recruitment of staff and everything in 200 between. **Appendix 10.** Illustrates Safeguarding in children’s services.

201 Abuse and neglect – child and young person context

202 3.20. In the context of a child/young person abuse and neglect are forms of maltreatment. Somebody may 203 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm. 204 Children/young people may be abused in a family or in an institutional or community setting, by those 205 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another 206 child/young person or children/young people.

207 3.21. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of these. 208 The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse - children.** The 209 signs that someone could be a victim or an abuser have been explored in **Appendix 6 and Appendix 7.** 210 Parents, carers and other people can harm children and young people by direct acts and/or failure to 211 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 11 - Further safeguarding information – what everyone needs to know.**

3.22. 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.

3.23. 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.**

3.24. 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 Suffolk County Council Safeguarding Board’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 Cambian Essex School 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 whistle-blowing helpline number 0800 028 0285** and the Cambian Whistleblowing service operated by **Ethics Point on 0800 086 9128.**

250 241 More information about EthicsPoint and how it can be contacted can be
251 found in the Whistleblowing
252 policy.

253 243 4.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to
254 support 244 school and college staff with when it is appropriate to contact the police.

255 245 4.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer 246 from
256 harm, it is important that a referral to children’s social care (and if appropriate the police) is made 247 immediately.
257 Referrals should follow the local referral process.

258 248 5. Policy

259 249 Safeguarding culture of the organisation

260 5.1. Cambian safeguarding culture can be best described as:

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

271 5.2. Child Protection and Safeguarding is everyone’s responsibility. Everyone working for or visiting our
272 locations has a responsibility to understand and implement this policy and procedure at all times.

273 5.3. All Individuals in our services have a right to feel safe, secure and be protected from harm.

274 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
275 Individuals with Special Educational Needs (SEN) and disabilities:

- 276 • Are more likely to be abused or neglected;
- 277 • May display behaviour, mood and/or injury which may relate to possible abuse and not just their SEN
278 or a particular disability.
- 279 • Have a higher risk of peer group isolation.
- 280 • Can be disproportionately impacted by things like bullying without outwardly showing any signs.
- 281 • Experience communication barriers and difficulties in overcoming these barriers.

282 5.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.
283 We will ensure all staff have the skills, knowledge and understanding to help keep children and young
284 people safe.

285 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or
286 disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care home
287 or in the community, taking into account contextual safeguarding, see **Appendix 11 - Further**

278 **safeguarding information – what everyone need to know** which also contains information related to 279 safeguarding issues related to individual children and young people’s needs.

280 5.7. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding 281 of safeguarding, through both formal curriculum and informal opportunities.

282 5.8. As an organisation we acknowledge that working in partnership with other agencies protects Individuals 283 and reduces risk and so we will engage in partnership, working throughout the child protection process 284 to safeguard children and will equally work through safeguarding adults’ procedures as directed by local 285 procedures.

286 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance 287 referred to in this document can be found in separate appendices at the end of this document.

288 **Divisional Safeguarding Board**

289 5.10. As an organisation Caretech children’s services operates 3 Divisional Safeguarding Boards: Education,

290 Residential Care and Fostering. The main purpose of each board is to ensure that all services across
291 all divisions discharge their responsibilities effectively for assuring safe and secure services for children
292 and young people, and manage all safeguarding risks appropriately within its own workforce,
including 293 direct employees and also the contracted workforce (supply workers/agency/contractor
and 294 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

295 **What staff should read and be aware of**

296 5.11. KCSIE 2023 guidance replaces Keeping Children Safe in Education 2022. The changes will come into force 297 from September 2022. The statutory guidance should be read and followed by the Proprietor(s) of 298 independent schools and non-maintained special schools and colleges. In both instances this includes 299 including Senior Leadership Teams.

300 5.12. All staff in Caretech/Cambian schools and colleges must read at least **Part One of KCSIE 2025** guidance 301 and school/colleges should have a record to confirm this has been completed by the end of September 302 2022.

303 5.13. HTs / Principals and DSL (or a deputy) should read the [whole KCSIE 2025 Guidance](#).

304 5.14. The guidance also suggests that Governors and Proprietor should read **Annex A** which is a condensed 305 version of Part one: ‘Annex A can be provided (instead of Part one) to those staff who do not directly 306 work with children, if the governing body or proprietor think it will provide a better basis for those staff 307 to promote the welfare and safeguard children’. The Organisation maintains that all staff including those 308 supporting the school/college with frequent or less frequent visits to the site read at **least Part One** so all 309 staff understand their safeguarding responsibilities.

310 5.16 The guidance should be read alongside:

- 311 • statutory guidance - [Working Together to Safeguard Children](#)
- 312 • departmental advice - [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#)
- 313 ; and;
- 314 • **Part 5 of KCSIE 2025** should be read alongside the departmental advice - [Sexual violence and sexual](#)
315 [harassment between children in schools and colleges](#) which contains further details on: what sexual 316 violence and sexual harassment constitutes, important context to be aware of, including; what is 317 consent, power imbalances, and developmental stages, harmful sexual behaviour (HSB), including 318 that a child displaying HSB may be an indication that they are a victim of abuse themselves, related 319 legal responsibilities for schools and colleges, advice on a whole school approach to preventing child 320 on child sexual violence and sexual harassment, and more detailed advice on responding to reports 321 of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) 322 and alleged perpetrator(s).

323 5.15. In July 2021 DSL (or a deputy) within Education division, Heads/Principals, Representative from Children’s 324 residential care (Senior Managers), Representatives from Business Support Functions and Directors 325 attended KCSIE2023 webinar provided by the Safeguarding Network. Following the webinar, recording of

326 session and the additional learning resources have been shared with the participants to support 327 dissemination to their teams.

328 5.16. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how 329 the learning will take place with their staff, organise KCSIE 2023 knowledge check (via Safeguarding 330 Network) and ensure that the record of completed knowledge check is stored on MYRUS - the 331 Organisation's Learning and Development platform.

332 5.17. The Heads/Principals and DSL should ensure that mechanisms are in place to assist staff to understand 333 and discharge their role and responsibilities as set out in Part one of KCSIE 2023 guidance. Schools and 334 colleges and their staff are an important part of the wider safeguarding system for children. This system 335 is described in the statutory guidance [Working Together to Safeguard Children](#).

336 5.18. All staff should be aware of systems within their school which support safeguarding and these should be 337 explained to them as part of staff induction. This should include the:

338 - Child protection and safeguarding policy

339 - Behaviour Support policy

340 - Anti bullying policy

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

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

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

344 - Have Access to policies and a copy of Part one of KCSIE 2023

345 - All staff should be aware of their local early help process and understand their role in it, more 346 information can be found in [Working Together to Safeguard Children 2018](#) 347 (publishing.service.gov.uk).

348 5.19. All staff should be aware of the process for making referrals to children's social care and for statutory 349 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child 350 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might 351 be expected to play in such assessments.

352 5.20. Schools concerned about a child's welfare should refer their concern to local authority children's social 353 care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's 354 social care (and if appropriate the police) is made immediately. Referrals should follow the local referral 355 process. Children's homes/care homes should follow their referral process as per their local procedure 356 and contact Safeguarding Partner/Safeguarding Board as per their local Safeguarding procedure.

357 5.21. All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff 358 should know how to manage the requirement to maintain an appropriate level of confidentiality. This 359 means only involving those who need to be involved, such as the DSL (or a deputy) and children's social 360 care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, 361 as this may ultimately not be in the best interests of the child.

362 5.22. Staff should **not** assume a colleague, or another professional will take action and share information that 363 might be critical in keeping children safe. They should be mindful that early information sharing is vital 364 for the effective identification, assessment, and allocation of appropriate service provision, whether this 365 is when problems first emerge, or where a child is already known to local authority children's social care 366 (such as a child in need or a child with a protection plan).

367 Whole service approach to Safeguarding

368 5.23. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school 369
approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront

395 370 and underpin all relevant aspects of process and policy development.
396 Ultimately, all systems, processes 371 and policies should operate with the best interests of the child at their heart.

397 372 5.24. Where there is a safeguarding concern, the proprietor and service leaders should ensure the child's 373 wishes
398 and feelings are taken into account when determining what action to take and what services to 374 provide. Systems
399 should be in place, and they should be well promoted, easily understood and easily 375 accessible for children to
400 confidently report abuse, knowing their concerns will be treated seriously, and 376 knowing they can safely express their
401 views and give feedback.

402 **377 Children with special educational needs and disabilities or physical health issues**

403 378 5.25. Children with special educational needs or disabilities (SEND) or certain health conditions can face 379
404 additional safeguarding challenges. There might be some additional barriers when recognising abuse and 380 neglect in
405 this group of children. These can include:

406 381 • assumptions that indicators of possible abuse such as behaviour, mood and injury relate to 382 the child's/young
407 person's condition without further exploration;

408 383 • these children/young people being more prone to peer group isolation or bullying 384 (including prejudice-based
409 bullying) than other children/young people;

410 385 • the potential for children/young people with SEND or certain medical conditions being 386 disproportionately
411 impacted by behaviours such as bullying, without outwardly showing any
412 387 signs; and

413 388 • Communication barriers and difficulties in managing or reporting these challenges.

414 389 5.26. SEN division and other services where children have/may have SEND should consider
415 extra pastoral 390 support and attention for these children, along with ensuring any
416 appropriate support for communication 391 is in place. Further information can be found
417 in the Department's: [SEND Code of Practice 0 to 25](#) and 392 [Supporting Pupils at School](#)
418 [with Medical Conditions](#).

419 393 **6. Procedure**

420 394 **Roles and responsibilities**

421 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors**
422 are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and
423 which encourages reporting of breaches of this policy using the appropriate procedures.

424 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors,
425 partner organisations and visitors are aware of the policy and are supported to implement and work in
426 accordance with it, as well as creating a management culture that encourages a focus on safeguarding.

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

429 6.3. The **DSL** is responsible for handling reports and/or concerns, about the protection of children, young people
430 and adults, appropriately and in accordance with the procedures that underpin this policy.
431

432 6.4. **Our DSL is Karen Carrington** who is a senior member of our leadership team. The role of the DSL is to:
433 • Ensure this child protection and safeguarding policy and local arrangements are known, understood
434 and used appropriately by the staff.

436 • Act as a source of support, advice and expertise for all staff, provide
437 support to staff to carry out their safeguarding duties.

- 438 • Act as a point of contact with the Safeguarding Authority.
- 439 • Take lead responsibility for referring and managing safeguarding issues and cases, unless
440 management of a particular case is passed on to a more senior member of the organisation – see
441 section of allegations (those meeting harm threshold and those which don't meet LADO criteria).
- 442 • Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior
443 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

- 444 and welfare (including online and digital safety) and when deciding whether to
 445 make a referral by liaising with relevant agencies so that children’s needs are considered holistically.
 446
- 447 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
 - 448 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child
 449 or adult) and where appropriate - Local Authority Designated Officer (LADO).
 - 450 • Liaise with the head teacher or principal (if they are not the DSL themselves) to inform him or her of
 451 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police
 452 investigations.
 - 453 • As required, liaise with the “case manager” and the local authority designated officer(s) (LADO) for
 454 child protection concerns in cases which concern a staff member.
 - 455 • Refer cases to the Channel programme where there is a radicalisation concern as required.
 - 456 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the
 457 Disclosure and Barring Service as required; and
 - 458 • Refer cases where a crime may have been committed to the Police as required.
 - 459 • Act as a source of advice, support and expertise within the location when deciding to make a referral
 460 by liaising with relevant agencies.
 - 461 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and
 462 child protection issues that children are experiencing, or have experienced, with teachers and school
 463 and college leadership staff.
 - 464 • Identify staff safeguarding training needs and organise training for their staff.
 - 465 • Participate in local safeguarding boards when required.
 - 466 • Evaluate and contribute to high standards of safeguarding practice at the location.
 - 467 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are
 468 guarded from harm or abuse.
 - 469 • Ensure the child protection and safeguarding policy is available publicly and parents/those with
 470 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be
 471 made and the role of the school/college/home in this.
 - 472 • Understands the relevant data protection legislation and regulations, especially The Data Protection
 473 Act 2018.
- 474 6.5. More details about the role of the DSL including their availability, management of referrals, information
 475 sharing, working with others, raising awareness and other can be found in [KCSIE 2025 Annex C – Role of
 476 the DSL](#).
- 477 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where
 478 asked do to so. There are arrangements for covering the role of the DSL when Karen Carrington is
 479 unavailable. Our Designated Deputy is .
 480
- 481 6.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected
 482 abuse and neglect should be given the highest priority.
- 483 6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and
 484 Safeguarding at Cambian**.
- 485 6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps
 486 to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff
 487 must use the correct forms when recording and managing concerns and allegations regarding the abuse

488 of individuals. Education services must use Behaviour Watch system:
489 Concern/Safeguarding function to record concerns. Where, throughout this policy, references are made
490 to the 'concern form' this means

464 either **25.04 Concern form** which is a word document (part of this policy) or the Behaviour Watch – 465 Concern/Safeguarding functionality where the system is being used.

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

467 6.10. **The DSL** is responsible for ensuring that child protection files are kept up to date. Information should be 468 kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child 469 protection file for each child. Schools and colleges should use the Behaviour Watch system - 470 Concern/Safeguarding function to record all concerns and to generate Safeguarding Tracking Packs per 471 child/young person as necessary.

472 6.11. Records should include:

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

476 6.12. They should ensure the file is only accessed by those who need to see it and where the file or content 477 within it is shared, this happens in line with information sharing advice as set out in Part one of KCSIE 478 2023 Schools and colleges using Behaviour Watch must set up their system Group purposes in line with 479 Behaviour Watch guidance. Behaviour Watch 'Safeguarding Group' controls who can view and report on 480 Concern/SG slips and 'Not Safeguarding Group' is an opposite Group to restrict who can complete certain 481 sections within the Concern/SG slips.

482 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for 483 each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school 484 additional options to contact a responsible adult when a child missing education is also identified as a 485 welfare and/or safeguarding concern.

486 **LADO referral criteria (KCSIE 2023) – meeting the harm threshold**

487 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if they 488 continue to work in regular or close contact with children in their present position, or in any capacity with 489 children in a school or college. This guidance should be followed where it is alleged that anyone working 490 in the school that provides education for children under 18 years of age, including supply teachers and 491 volunteers has:

- 492 • A person(s) behaved in a way that has harmed a child, or may have harmed a child, and/or,
- 493 • A person(s) possibly committed a criminal offence against or related to a child, and/or,
- 494 • A person(s) behaved towards a child or children in a way that indicates he or she may pose a risk of 495 harm to children; and/or,
- 496 • A person(s) behaved or may have behaved in a way that indicates they may not be suitable to work 497 with children

498 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the 499 Children Act 1989 as amended by the Adoption and Children Act 2002](#).

500 6.16. The last bullet point above includes behaviour that may have happened outside of school that might 501 make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate 502 an assessment of transferable risk to children with whom the person works should be undertaken. If in 503 doubt seek advice from the local authority designated officer (LADO).

504 6.17. This above information relates to members of staff, supply staff and volunteers who are currently working 505 in any school, regardless of whether the school is where the alleged abuse took place. Allegations against 506 a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should 507 also be referred to the police.

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

509 6.18. Many children and young people in our services (Education and care) organisation have an allocated 510 social worker due to safeguarding or welfare needs.

511 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's 512 experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally 513 disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

514 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this 515 information so that decisions can be made in the best interests of the child's safety, welfare and 516 educational outcomes. This should be considered as a matter of routine. There are clear powers to share 517 this information under existing duties on both local authorities and schools and colleges to safeguard and 518 promote the welfare of children.

519 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example, 520 responding to unauthorised absence or missing education where there are known safeguarding risks) and 521 about promoting welfare (for example, considering the provision of pastoral and/or academic support, 522 alongside action by statutory services). Schools/colleges must follow missing from education protocol 523 agreed with their LA.

524 **Unexplained body marks**

525 6.22. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises, 526 swellings, cuts and scratches which by and large will be as a result of daily activities or for some Individuals 527 as a result of self-injurious behaviour. However, all marks or physical changes must be recorded 528 appropriately using (number to be added) weekly body chart. A Concern form must be completed for all 529 unexplained marks and physical changes and passed to the DSL (or a deputy) along with copies of the last 530 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always be kept 531 informed. Concern log should be updated with concern and relevant reference number provided to

532 concern.

533 6.23. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the 534 correct course of action for dealing with unexplained body marks.

535 6.24. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no 536 reasonable explanation can be given the DSL must contact the Safeguarding Authority/LADO for further 537 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

538 6.25. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be 539 opened and safeguarding process followed.

540 6.26. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome 541 must be shared with social worker and parents.

542 **A disclosure from an Individual**

543 6.27. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
544 **procedure.**

545 6.28. It is important to note that children/young people may not find it easy to tell staff about their abuse 546 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react 547 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a 548 member of school staff may overhear a conversation that suggests a child has been

harmed or a 549 child's/young person's own behaviour might indicate that something is wrong. If staff have any concerns

- 550 about a child's/young person's welfare, they should act on them immediately
551 rather than wait to be told and follow the procedure described in **Appendix 3. Child Protection and**
552 **safeguarding procedure.**
- 553 6.29. In case of reports of sexual violence and sexual harassment between children and young people,
554 these are extremely complex to manage. It is essential that victims are protected, offered
555 appropriate support and every effort is made to ensure their education and care is not disrupted.
556 It is also important that other children, young people and staff are supported and protected as
557 appropriate.
- 558 6.30. The service's initial response to a report from a child is incredibly important. How the staff
559 respond to a report can encourage or undermine the confidence of future victims of sexual
560 violence and sexual harassment to report or come forward.
- 561 6.31. If the child/young person makes a disclosure - **Listen** to what they have to say and take them
562 seriously. Reassure them but do not promise to keep it a secret. Not promising confidentiality
563 at this initial stage as it is very likely a concern will have to be shared further (for example, with
564 the DSL and Safeguarding Authority) to discuss next steps. Staff should only share the report
565 with those people who are necessary in order to progress it. It is important that the victim
566 understands what the next steps will be and who the report will be passed to.
- 567 6.32. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries
568 and how the report will be progressed, don't ask leading questions and only prompt the child
569 where necessary with open questions – where, when, what, etc. It is important to note that
570 whilst leading questions should be avoided, staff can ask children if they have been harmed and
571 what the nature of that harm was.
- 572 6.33. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the
573 school staff. It is important that the person to whom the child discloses recognises that the child
574 has placed them in a position of trust. They should be supportive and respectful of the child.
- 575 6.34. **Consider** the best way of making a record of the report. Best practice is to wait until the end of
576 the report and immediately write up a thorough summary. This allows the staff member to
577 devote their full attention to the child and to listen to what they are saying. It may be appropriate
578 to make notes during the report (especially if a second member of staff is present). However, if
579 making notes, staff should be conscious of the need to remain engaged with the child and not
580 appear distracted by the note taking. Either way, it is essential a written record is made using
581 Concern form which is part of this policy. The written record must be fully completed within
582 maximum of 24 hours of the disclosure, but verbal report to the DSL must be completed within
583 an hour from the moment of the disclosure being made.
- 584 6.35. Only recording the facts as the child presents them. The notes should not reflect the personal
585 opinion of the note taker. Staff should be aware that notes of such reports could become part
586 of a statutory assessment by Safeguarding Authority and/or part of a criminal investigation.
- 587 6.36. In cases where either a child/young person informs the staff that an act of FGM – however
588 described – has been carried out on her, or where the staff observes physical signs on a girl
589 appearing to show that an act of FGM has been carried out these situations, the DSL must be
590 informed, who will trigger child protection/safeguarding procedures described in this policy and
591 contact the Police. If a child/young

587 person is at immediate risk – the Police (999) must be contacted immediately. If a child/young person 588 required medical attention follow steps identified in ‘Setting priorities’ section below.

- 589 6.37. Remember, **do not**:
- 590 • Investigate the incident
- 591 • Ask leading questions
- 592 • Get the young person to repeat the disclosure over and over
- 593 • Make assumptions or offer alternative explanations
- 594 • Approach/inform the alleged abuser
- 595 6.38. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting 596 and recording procedure.**

597 6.39. All staff know that they can contact the Local Authority direct should that be necessary. Where a 598 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding 599 Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt 600 with by the local Safeguarding Adult Board.

601 6.40. For allegation made against a staff member or senior managers/directors follow relevant allegations 602 procedures described later on in this policy.

603 6.41. Where contact is made with the Local Authority in which Cambian Essex School is geographically located, 604 contact will also be made with the individual’s own Local Authority and also the child/young person’s 605 social worker. This will be completed by one of the members of the school/college/home’s safeguarding 606 team.

607 6.42. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be 608 informed immediately a and they can take immediate protective action as necessary.

609 6.43. If a member of staff feels their concerns are not being taken seriously then they are to inform a more 610 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding 611 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128.**

612 Risk Assessment

613 6.44. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk 614 and needs assessment. Where there has been a report of sexual harassment, the need for a risk 615 assessment should be considered on a case-by-case basis. The risk and needs assessment should

- 616 consider:
- 617 • the victim, especially their protection and support,
- 618 • whether there may have been other victims,
- 619 • the alleged perpetrator(s); and
- 620 • all the other children, (and, if appropriate, adult students and staff) at the school especially,
- 621 and any actions that are appropriate to protect them from the alleged perpetrator(s), or
- 622 from future harms.

623 6.45. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, 624 staff should be actively considering the risks posed to all their pupils and students and put adequate 625 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are 626 engaging with Safeguarding Authority and specialist services as required. Where there has been a report 627 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence 628 specialists will be required. The above school risk assessment is not intended

to replace the detailed 629 assessments of expert professionals. Any such professional assessments should be used to inform the 630 school's or college's approach to supporting and protecting their pupils and students and updating their

631 own risk assessment.

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

633 6.46. Important considerations will include:

634 • the wishes of the victim in terms of how they want to proceed. This is especially important in 635 the context of sexual violence and sexual harassment. Victims should be given as much control 636 as is reasonably possible over decisions regarding how any investigation will be progressed and 637 any support that they will be offered. This will however need to be balanced with the school's 638 or college's duty and responsibilities to protect other children;

639 • the nature of the alleged incident(s), including whether a crime may have been committed 640 and/or whether HSB has been displayed;

641 • the ages of the children involved;

642 • the developmental stages of the children involved;

643 • any power imbalance between the children. For example, is the alleged perpetrator(s) 644 significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?

646 • if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be 647 accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);

649 • that sexual violence and sexual harassment can take place within intimate personal relationships between peers;

651 • are there ongoing risks to the victim, other children, adult students or school staff; and

652 • other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

654 6.47. As always when concerned about the welfare of a child, all staff should act in the best interests of the 655 child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout 656 this guidance. Immediate consideration should be given as to how best to support and protect the victim 657 and the alleged perpetrator(s) (and any other children involved/impacted). 658 **Options to manage the report**

659 6.48. It is important that schools and colleges consider every report on a case-by-case basis. When to inform 660 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going 661 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school should speak 662 to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the 663 allegations. However, as per general safeguarding principles, this does not and should not stop the school 664 taking immediate action to safeguard their children, where required.

665 6.49. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual 666 violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are 667 regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly 668 important to look out for potential patterns of concerning, problematic or inappropriate behaviour. 669 Where a pattern is identified, the school

should decide on a course of action. Consideration should be given as to whether there are wider cultural issues within the school 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:

673 • **Manage internally;** In some cases of sexual harassment, for example, one-off incidents, the school 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

705 676 handle the incident internally, perhaps through utilising their behaviour
706 policy and by
707 677 providing pastoral support.

708 678 • **Early help:** In line with the above, the school may decide that the children involved do
709 not 679 require referral to statutory services but may benefit from early help. Early help
710 means 680 providing support as soon as a problem emerges, at any point in a child's life.
711 Providing 681 early help is more effective in promoting the welfare of children than
712 reacting later. Early 682 help can be particularly useful to address non-violent HSB and may
713 prevent escalation of 683 sexual violence. It is particularly important that the DSL (and their
714 deputies) know what the 684 Early Help process is and how and where to access support.

715 **685 • Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm, 686 or is in immediate
716 danger, schools and colleges should make a referral to the local 687 Safeguarding Authority. At the point of referral,
717 schools and colleges will generally inform 688 parents or carers, unless there are compelling reasons not to (if informing
718 a parent or 689 carer is going to put the child at additional risk). Any such decision should be made with 690 the support
719 of children's social care.

720 **691 • Reporting to the Police** - any report to the police will generally be in parallel with a referral 692 to children's social
721 care (as above. It is important that the DSL and their deputies) are clear 693 about the local process for referrals and
722 follow that process.

723 694 6.50. More information about the four areas listed above, considering bail conditions, managing any delays in
724 695 the criminal process and the end of criminal process can be found in [KCSIE 2025 Part 5 para 452](#).

725 **696 Unsubstantiated, unfounded, false or malicious reports**

726 697 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider 698
727 whether the child and/or the person who has made the allegation is in need of help or may have been 699 abused by
728 someone else and this is a cry for help. In such circumstances, a referral to Safeguarding 700 authority may be
729 appropriate.

730 701 6.52. If a report is shown to be deliberately invented or malicious, the school or college, should consider
731 702 whether any disciplinary action is appropriate against the individual who made it as per their own 703 behaviour
732 policy.

733 **704 Safeguarding and supporting the victim**

734 6.53. The needs and wishes of the victim should be paramount (along with protecting the child) in any response.
735 It is important they feel in as much control of the process as is reasonably possible. Wherever possible,
736 the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be
737 to make the victim's daily experience as normal as possible, so that the school is a safe space for them.

738 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the potential
739 risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence
740 and sexual harassment, a power imbalance is likely to have been created between the victim and alleged
741 perpetrator(s).

742 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel
743 ashamed for making a report. This has been made clear throughout this policy and procedure.

744 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
745 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
746 from that for a report of rape.

747 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,
748 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a

749 health need arising from sexual assault or abuse can access specialist NHS
 750 support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental
 751 support to victims and survivors

752 723 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children 724 and
 753 adults, regardless of when the incident occurred.

754 725 6.58. More information about Early help, Children and young people’s Independent Sexual Violence Advisors 726
 755 and ChISVAs services (where available), CAMHS and other can be found in [KCSIE 2023 Part 5 para 456](#). 727 **Safeguarding**
 756 **and supporting the alleged perpetrator(s)**

757 728 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: 729
 758 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles 730 are based
 759 on effective safeguarding practice and should help shape any decisions regarding safeguarding 731 and supporting the
 760 alleged perpetrator(s):

761 732 • The school will have a difficult balancing act to consider. On the one hand, they need to 733 safeguard the victim
 762 (and the wider pupil/student body) and on the other hand provide 734 the alleged perpetrator(s) with an education,
 763 safeguarding support as appropriate and 735 implement any disciplinary sanctions. Taking disciplinary action and still
 764 providing 736 appropriate support are not mutually exclusive actions. They can, and should, occur at the
 765 737 same time if necessary.

766 738 • Consider the age and the developmental stage of the alleged perpetrator(s), the nature
 767 of 739 the allegations and frequency of allegations. Any child will likely experience stress
 768 as a 740 result of being the subject of allegations and/or negative reactions by their peers
 769 to the
 770 741 allegations against them.

771 742 • Consider the proportionality of the response. Support (and sanctions) should be
 772 743 considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet
 773 744 needs (in some cases these may be considerable) as well as potentially posing a risk of
 774 harm 745 to other children. HSB in young children may be (and often are) 126 a symptom
 775 of either 746 their own abuse or exposure to abusive practices and or materials.

776 747 • It is important that the perpetrator(s) is/are also given the correct support to try to stop 748 them re-offending
 777 and to address any underlying trauma that may be causing this 749 behaviour. Addressing inappropriate behaviour can
 778 be an important intervention that 750 helps prevent problematic, abusive and/or violent behaviour in the future.

779 751 • Advice on behaviour and discipline in schools is clear that teachers can discipline pupils 752 whose conduct falls
 780 below the standard which could be reasonably expected of them. If 753 the perpetrator(s) is to be excluded the decision
 781 must be lawful, reasonable and fair.

782 754 6.60. More information in relation to this section can be found in [KCSIE 2023 Part 5](#).
 783 755 **Setting priorities**

784 6.61. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
 785 safety of the individual.

786 6.62. Where appropriate, any concerns will be discussed with the Individual’s family / carers and where possible
 787 their agreement with be sought to making a referral to the Local Authority. However, where there is a
 788 conflict of interests between the Individual and parent/guardian, the interests of the Individual must take
 789 priority and Cambian Essex School the right to contact the Individual’s local authority, Social Care or the
 790 Police, without notifying parents/carers if this is in their best interests.

792 6.63. If an urgent medical attention or advice is required and GP/speciality
793 doctor is not available, staff MUST use the NHS **111** service. NHS **111** is available 24 hours a day, 7 days a
week.

794 6.64. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance. Alternatively,
795 if it's assessed to be in the best interest of the child/young person - the DSL MUST take the Individual to
796 the Accident and Emergency Unit at the nearest hospital, having first notified the Local

768 Authority/Police, remembering that every reasonable effort should be made to inform the parents/carers 769 as soon as possible.

770 6.65. If the suspected abuse is sexual, then the medical professional must determine if the medical examination 771 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility 772 that the needs of the young person are such that medical attention is the priority, in such case medical 773 professional's judgment must be followed. There must at all times be an Appropriate adult (parent 774 guardian or a social worker) with the individual whether from the Individual's care home/school/college, 775 the Local Authority or the Police, if the parents/carers are not included. This section must be read in 776 conjunction with our **0.29. Child Sexual Exploitation policy.**

777 6.66. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak for 778 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA. 779 Further information on MCA are available in our **0.13. Mental Capacity and Consent policy.**

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

781 6.67. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for 782 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual 783 is suffering or likely to suffer significant harm'. DSL must refer peer on peer abuse to a Safeguarding 784 Authority, local Authority and Regulator.

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

786 6.68. If we were given information that suggested that someone who does not reside at or attends our location 787 has been abused by one of our members of staff, the DSL would immediately report this to the Local 788 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted. 789 Should the staff member be involved we would then formally advise the member of staff of the allegation, 790 making it clear that we would not play any part in the investigatory process. The employee would be 791 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived 792 risks) etc., in exactly the same way as if the allegation had involved an Individual at our 793 home/school/college. However, HR Business Partner must be consulted before any action is taken. If the 794 allegation is subsequently proved to be unfounded, he or she would be given full support in resuming 795 their career. Should we be asked by LADO/Safeguarding authority to be involved in any potential 796 investigations or parts of it, a HR Business Partner will have to be consulted first. At this point an 797 assessment will need to be made to identify what detail (if any) can be disclosed to a member of staff 798 involved.

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

800 6.69. If we were given information that suggested that someone who does not reside at or attends our location 801 has been abused by a third party (known or unknown to the provision), the DSL would immediately report 802 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice

817 803 provided by the leading agency and report back to the Head of Service who
818 will explore any associated 804 risk/s in relation to the provision.

819 805 Allegations against staff

820 806 6.70. All allegations must be reported to the DSL [Karen Carrington] or in their absence to DSL Deputy – see 807 your
821 local Safeguarding poster. Also, where appropriate - HR Business Partner (Alexandra Wainwright)
822 808 must be consulted.

823 809 6.71. When an allegation is made against a member of staff, set procedures must be followed, see the
824 flow 810 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart).**

825 811 6.72. Staff MUST act on every allegation; all repeated allegations must be treated as new and carefully assessed 812
826 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with 813 fairly, quickly
827 and consistently and to be kept informed of its progress.

828 814 6.73. Staff should refer to the **25.08. Guidance for staff who have the allegation made against them** provided
829 815 for what to do in the event an allegation is made against them.

830 816 Allegations against staff in Education

831 6.74. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.
832 KCSIE 2023 splits the type of allegations into two groups:

- 833 • Allegations that may meet the harms threshold (see **LADO referral criteria (KCSIE 2023) –**
834 **meeting the harm threshold** of this policy)
- 835 • Allegation/concerns that do not meet the harms threshold – referred in the guidance and
836 this policy as ‘low level concerns.’

837 6.75. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they
838 continue to work in regular or close contact with children in their present position, or in any capacity with
839 children in a school or college. The KCSIE 2023 guidance should be followed where allegations are made
840 against anyone working in the school that provides education for children under 18 years of age, including
841 supply teachers and volunteers.

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

851 6.77. Where an adult makes an allegation to a school that they were abused as a child, the individual should
852 be advised to report the allegation to the police. Non-recent allegations made by a child, should be
853 reported to the LADO in line with the local authority’s procedures for dealing with non-recent allegations.
854 The LADO will coordinate with children social care and the police. Abuse can be reported no matter how
855 long ago it happened.

856 6.78. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher
857 because of serious misconduct, or might have dismissed them or ceased to use their services had they
858 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching
859 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found
860 on GOV.UK.

861 847 **Allegations against supply teachers and all workers supplied by agency**

862 848 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual
863 not
864 849 directly employed by them, where its disciplinary procedures do not fully apply because agencies will

850 have their own policies and procedures; for example, supply teachers or contracted staff provided by an 851 employment agency or business.

852 6.80. Whilst the Organisation's schools and colleges are not the employer of supply teachers, they should 853 ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use a 854 supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to 855 determine a suitable outcome. Schools and colleges must also consult HR Business Partner who may 856 advise further. Governing bodies and proprietors should discuss with the supply agency or agencies 857 where the supply teacher is working across a number of schools of colleges, whether it is appropriate to 858 suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry 859 out their investigation.

860 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or 861 children's social care. The school will usually take the lead because agencies do not have direct access to 862 children or other school of college staff, so they will not be able to collect the facts when an allegation is 863 made, nor do they have all the relevant information required by the LADO as part of the referral process.

864 6.82. When using a supply agency, schools and colleges should inform the agency of its process for managing 865 allegations but also take account of the agency's policies and investigatory process and their duty to refer 866 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or 867 equivalent to meetings and keeping them up to date with information about its policies. It is important 868 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be 869 consulted. 870

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

872 6.83. All allegations must be reported to:

873 - Education division: Regional Education Lead Kicha Mitchell. For the DSL fulfilling the role as their 874 substantive role, all allegations must be reported to the Principal/Head.

875 - Children's residential care division: Regional Manager Michael Coleman unless Regional Manager is 876 the DSL in which case the matter will be referred to the Managing Director.

877 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above) will 878 then refer the matter to local Safeguarding Authority/LADO and notify their line manager:

879 Education division: Regional Education Lead Kicha Mitchell or

880 - Managing Director for Education Andrew Sutherland, who is also the Proprietor representative for

881 Education

882 6.85. The person who referred the matter to local Safeguarding Authority/LADO in line with agreed course of 883 action will decide about who will lead the case including management investigation – should the 884 allegation threshold be met. The appropriate HR Business Partner should be notified, so they can advise 885 and where required - support the investigation.

886 6.86. **Services using Behaviour Watch system** – allegations made against the DSL or DSL Deputy who have full 887 access to the system including Concern/Safeguarding function, should not be initially entered to the 888 system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as they would 889 have been prior to implementation of the Behaviour Watch. This is to ensure that no one, including those 890 who are part of the service's Safeguarding Team, are able to see the details of their own case which could 891 have a detrimental impact on the investigation itself and the outcome of it. However, once the case has 892 been concluded, a decision should then be made about whether or not the detail related to the case 893 should be retrospectively entered in to Behaviour Watch or kept in the original format. Such a decision 894 should be made by the Case Manager, Managing Director and a member of HR Team. Should a decision 895 be made to keep it in the original format, a Concern/SG slip in the Behaviour Watch must still be 896 retrospectively opened and a note added to reflect that there was an allegation made against

the DSL/DSL 897 Deputy but without specifying any further detail about the character of the allegation. Instead a reference 898 number of the case and location of the pack related to the case is provided. This action will ensure that

924 899 the case has been captured in the system which will then allow the service
925 to generate a log with accurate 900 numbers of concerns and safeguarding cases for the service.

901 Allegations against the Regional Manager/other Regional staff

927 902 6.87. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the 903
928 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this, 904 the allegation
929 should be passed to the identified senior person to follow through with local Safeguarding 905 Authority/LADO and
930 subsequently act in line with agreed course of action. This means that the DSL will 906 retain the responsibility to report
931 the initial concern, but will have no further part in the process regarding 907 gathering any information or, should it be
932 required, in the actual investigation in relation to a senior
933 908 member.

934 909 6.88. Allegations not linked to specific site must be reported to Managing Director who will refer the
935 matter to 910 local Safeguarding Authority/LADO and act in line with agreed course of action.

936 911 6.89. The appropriate HR Business Partner should be notified, so they can advise and where required -
937 support
938 912 the investigation.

913 Allegations against the Managing Director

940 914 6.90. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral 915
941 to local Safeguarding Authority/LADO. Following this, the allegation should be passed to the identified 916 senior person
942 to follow through with local Safeguarding Authority/LADO and subsequently act in line with
943 917 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern,
944 918 but will have no further part in the process regarding gathering any information or, should it be required,
945 919 in the actual investigation in relation to a senior member.

946 920 6.91. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the 921 matter
947 to local Safeguarding Authority/LADO and act in line with agreed course of action.

948 922 6.92. The Head of HR should be notified, so they can advise and where required - support the investigation.

923 Allegations against any other Senior Leader

950 923 6.93. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
951 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO Following this,
952 the allegation should be passed to the identified senior person to follow through with local Safeguarding
953 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will
954 retain the responsibility to report the initial concern, but will have no further part in the process regarding
955 gathering any information or, should it be required, in the actual investigation in relation to a senior
956 member.

957 924 6.94. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)
958 line manager who will refer the matter to local Safeguarding Authority/LADO and act in line with agreed
959 course of action.

960 925 6.95. The Head of HR should be notified, so they can advise and where required - support the investigation.

935 Allegations against the Chief Operating Officer / Head of Children's Services

962 936 6.96. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the 937
963 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this, 938 the allegation
964 should be passed to the identified senior person to follow through with local Safeguarding 939 Authority/LADO and
965 subsequently act in line with agreed course of action. This means that the DSL will 940 retain the responsibility to report
966 the initial concern, but will have no further part in the process regarding

941 gathering any information or, should it be required, in the actual
942 investigation in relation to a senior
member.

943 6.97. Allegations not linked to specific site must be reported to the Chair of the Care Governance
Committee - 944 Moira Livingstone - who will refer the matter to local Safeguarding Authority/LADO and
act in line with 945 agreed course of action.

946 6.98. The Head of HR should be notified, so they can advise and where required - support the investigation.

947 **Allegations against the Chief Executive Officer**

948 6.99. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral 949
to local Safeguarding Authority/LADO Following this, the allegation should be passed to the identified 950 senior person
to follow through with local Safeguarding Authority/LADO and subsequently act in line with
951 agreed course of action. This means that the DSL will retain the responsibility to report the initial concern, 952 but
will have no further part in the process regarding gathering any information or, should it be required, 953 in the actual
investigation in relation to a senior member.

954 6.100. Allegations not linked to a specific site must be reported to the Chair of the Care Governance Committee 955
- Moira Livingstone who will refer the matter to local Safeguarding Authority/LADO and act in line with 956 agreed course
of action.

957 6.101. The Head of HR should be notified, so they can advise and where required - support the investigation.

958 **Low level concerns**

959 6.102. As part of their whole school approach to safeguarding, schools and colleges should ensure that they
960 promote an open and transparent culture in which all concerns about all adults working in or on behalf 961
of the school (including supply teachers, volunteers and contractors) are dealt with promptly and 962
appropriately.

963 6.103. Creating a culture in which all concerns about adults (including allegations that do not meet the harms
964 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is 965
critical. If implemented correctly, this should encourage an open and transparent culture; enable schools 966
and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of 967
abuse; and ensure that adults working in or on behalf of the school are clear about professional 968
boundaries and act within these boundaries, and in accordance with the ethos and values of the 969
institution.

970 6.104. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards
971 a child does not meet the threshold set out in **LADO referral criteria (KCSIE 2025) – meeting the harm 972
threshold section. If there is any doubt about whether or not the concern meets LADO referral criteria
973 – LADO should be contacted and advice sought.**

974 6.105. A low-level concern is any concern – no matter how small, and even if no more than
975 causing a sense of
unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have
acted in a way
976 that:

977 • is inconsistent with the staff code of conduct, including inappropriate conduct outside
of
978 work; and

979 • does not meet the allegations threshold or is otherwise not considered serious enough
to
980 consider a referral to the LADO

981 6.106. Examples of such behaviour could include, but are not limited to:

- 982
- being over friendly with children;
- 983
- having favourites;
- 984
- taking photographs of children on their mobile phone (this depend on the circumstances,
- 985
- so it would require DSL assessment and LADO advice)
- 986
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- 987
- using inappropriate sexualised, intimidating or offensive language.

988 6.107. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may 989 look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately 990 intended to enable abuse.

991 6.108. It is crucial that any such concerns, including those which do not meet the harm threshold (see [Part Four 992 - Section one](#)), are shared responsibly and with the right person, and recorded and dealt with 993 appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf 994 of schools and colleges from potential false allegations or misunderstandings.

995 **The initial response to allegation**

996 6.109. Where the school identifies a child/young person has been harmed, that there may be an immediate risk 997 of harm to a child/young person or if the situation is an emergency, they should contact the Safeguarding 998 Authority and as appropriate the police immediately as per the processes. There are two aspects to 999 consider when an allegation is made:

1000 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is 1001 not at risk and referring cases of suspected abuse to the local authority children's social 1002 care as described in Part one of this guidance.

1003 • **Investigating and supporting the person subject to the allegation** - the case manager 1004 should discuss with the LADO, the nature, content and context of the allegation, and agree

1005 a course of action.

1006 6.110. When dealing with allegations, schools and colleges should:

- 1007
- apply common sense and judgement
- 1008
- deal with allegations quickly, fairly and consistently; and
- 1009
- provide effective protection for the child and support the person subject to the allegation.

1010 6.111. Schools and colleges should ensure they understand the local authority arrangements for managing 1011 allegations, including the contact details and what information the LADO will require when an allegation 1012 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with 1013 local procedures to establish the facts to help them determine whether there is any foundation to the 1014 allegation, being careful not to jeopardise any future police investigation. For example:

- 1015
- was the individual in the school at the time of the allegations?

1016 • did the individual, or could they have, come into contact with the child?

1017 • are there any witnesses? and,

1018 • was there any CCTV footage?

1019 6.112. These are just a sample of example questions. Services should be familiar with what initial information 1020 the LADO will require. This information can be found in local policy and procedural guidance provided by 1021 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared 1022 with the HR department to support any investigation.

1023 6.113. When to inform the individual of the allegation should be considered carefully on a case by case basis, 1024 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1025 6.114. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion 1026 involving the police and/or children’s social care will be convened in accordance with the statutory 1027 guidance [Working Together to Safeguard Children](#).

1028 6.115. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the 1029 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps 1030 with the case manager (A ‘case manager’ will be the person leading any investigation. This will be either the 1031 DSL/DSL Deputy which is often the Principal/Head/Registered Manager or, where the case manager is 1032 the subject of an allegation, it will be the Proprietor or a Director nominated by them). A LADO should be 1033 informed who will lead investigation to ensure there is no conflict of interest or any other concerns 1034 related to the choice of the case manager.

1035 **No Further Action**

1036 6.116. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO should:

1038 • record the decision and justification for it; and,

1039 • agree on what information should be put in writing to the individual concerned and by

1040 whom.

1041 **Further enquiries**

1042 6.117. Where further enquiries are required to enable a decision about how to proceed, the LADO and case 1043 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, 1044 the investigation should normally be undertaken by a senior member of the school’s or college’s staff.

1045 6.118. Where there is a lack of appropriate resource within the school or college, or the nature or complexity 1046 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional 1047 Manager (Education or Care), a Director, HR Business Partner or an independent investigator if 1048 appropriate.

1049 6.119. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as 1050 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, 1051 depending on the complexity of the case.

1052 6.120. Wherever possible, the first review should take place no later than four weeks after the initial 1053 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review 1054 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges

1055 when considering allegations against adults working with children. The LADO’s role is not to investigate 1056 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, 1057 children’s social care, the school or college, or a combination of these. 1058 **Suspension**

1059 6.121. Suspension should not be an automatic response when an allegation is reported. All options to avoid 1060 suspension should be considered prior to taking that step. The case manager must consider carefully 1061 whether the circumstances warrant suspension from contact with children at the school or college, or 1062 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a 1063 child or other children at the school is/are at risk of harm, or the allegation could be considered as gross 1064 or serious misconduct. Prior to any suspension, the case manager must consult with their HR Business 1065 Partner and the LADO, as well as the police and Safeguarding Authority where they have been involved.

1066 More information on suspension and associated process can be found in [KCSIE 2023 Part 4](#). 1067 **Supporting those involved**

1068 6.122. The welfare of a child/young person is paramount (how children should be protected and supported is 1069 set out throughout KCSIE 2023 guidance) and this will be the prime concern in terms of investigating an 1070 allegation against a person in a position of trust. However, when an allegation or safeguarding concern is 1071 being investigated it is likely to be a very stressful experience for the adult subject of the investigation, 1072 and potentially for the family members. It is important that an employer offers appropriate welfare 1073 support at such a time and recognises the sensitivity of the situation. Information is confidential and 1074 should not ordinarily be shared with the other staff or with children or parents who are not directly 1075 involved in the investigation. More about employers duty of care to their employees can be found in 1076 [KCSIE 2023 part 4/Duty of care](#).

1077 6.123. Staff whom allegation/s have been made against must always be supported and if suspended they will 1078 receive a support person (nominated contact), any suspension is not an indication of guilt.

1079 **Allegation outcomes**

1080 6.124. The definitions that should be used when schools and colleges determine the outcome of an allegation

1081 are set out below:

- 1082 • Substantiated: there is sufficient evidence to prove the allegation;
- 1083 • 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;
- 1084
- 1085 • False: there is sufficient evidence to disprove the allegation;
- 1086 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. 1087 The term, therefore, does not imply guilt or innocence; or
- 1088 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- 1089

1090 6.125. It should be noted that these definitions are available to support the decision-making process. However, 1091 in certain cases, in the absence of any substantiating evidence, the Company may still progress through 1092 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief 1093 that an employee has committed an act of misconduct.

1094 6.126. Ultimately the options open to the school depend on the nature and circumstances of the allegations 1095 and the evidence and information available. This will range from taking no further action, to dismissal or 1096 a decision not to use the person's services in future. Suspension should not be the default position, an

1103 1097 individual should be suspended only if there is no reasonable
 1104 alternative ([see paragraphs 361-368 on](#)
 1105 1098 [suspension](#)).

1106 1099 **Serious incident reporting**

1107 1100 6.127. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported 1101
 1108 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

1109 1102 **Death of someone in our care including rapid response to unexpected death**

1110 6.128. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
 1111 rapid response process described below:

1112

- 1113 • **Call the Ambulance and Police**
- 1114 • Unless the 999 operator tells you to, do not touch the person, do not move anything around them
 1115 which may form part of forensic evidence. Police will make a decision about the forensic examinations
 and appropriate security of the scene.
- 1116 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI) reporting
 1117 procedure. The DSL will contact the Managing Director of the division they work in and verbally inform
 1118 them of what happened before completing SUI Part 2.
- 1119 • DSL will contact Children’s/Adults Social Care Team
- 1120 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services (CAMHS)
 1121 should also be notified by the Safeguarding Authority.

1122 6.129. Once the above rapid steps have been taken, further steps described below must be followed.

1123 6.130. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the following
 1124 within 24 hours:

- 1125 • Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager
 1126 following the **35.01. Caretech Children’s services SUI process.**
- 1127 • Next of kin/parents/carer of the deceased.
- 1128 • Where the death of an individual occurs in an education location the assistance of the local police and
 1129 social services department should be sought in informing the parents/guardians.
- 1130 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
- 1131 • Ministry of justice if applicable.
- 1132 • The placing authority/authorities.
- 1133 • The local authority responsible for Social Services and Education (where the death takes place in a
 1134 registered school) within whose area the education location is situated.
- 1135 • The District Health Authority within whose area the education location is situated.
- 1136 • The Department for Education, (where the death takes place in a registered school).
- 1137 • The Health and Safety Executive.

1138 1131 **Abuse of position of trust**

1139 1132 6.131. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition, 1133
 1140 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the 1134 age of 18 to
 1141 have a sexual relationship with a person under the age of 18, where that person is in a 1135 position of trust, even if the
 1142 relationship is consensual. This means that any sexual activity between a

1136 member of the staff and a young person under 18 may be a criminal offence, even if that young person 1137 is over the age of consent.

1138Visitors

1139 6.132. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.
1140 All unauthorised visitors will be challenged by staff and reported to the home manager/head/principal 1141 before entry is authorised.

1142Volunteers

1143 6.133. Volunteers undergo checks commensurate with their work in the home/school/college and contact with
1144 children, young people and adults i.e. if they are in regulated activity or not. 1145**Contractors**

1146 6.134. We will check the identity of all contractors working on site and requests the full range of DBS and other
1147 required checks where they work in regulated activity or unsupervised in accordance with the latest 1148
government guidance.

1149Use of school premises for non-school/college activities

1150 6.135. Where governing bodies or proprietors hire or rent out school facilities/premises to organisations or 1151
individuals (for example to community groups, sports associations, and service providers to run 1152 community or extra-
curricular activities) they should ensure that appropriate arrangements are in place 1153 to keep children safe. More
information can be found in [KCSIE 2023 Part 2 para 155 & 156](#). 1154**Extended school and off-site arrangements**

1155 6.136. Where extended off-site activities are provided by and managed by us, our safeguarding policy and 1156
procedures apply. If other organisations provide services or activities on our site we will check that they 1157 have
appropriate policies and procedures in place, including safer recruitment procedures and clarify 1158 whose procedure
is to be followed if there are concerns. There will be clear communication channels to 1159 ensure the DSL is kept
appropriately informed.

1160 6.137. When our Individuals are doing off-site activities, including day and residential visits and work related 1161
activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL 1162 will be kept
appropriately informed.

1163Use of mobile phones

1164 6.138. Staff must behave in accordance with the **GHR 37. Staff Code of Conduct** and Internet and social media 1165
access including **Pro 01. Mobile Telephony Policy** at all times.

1166 6.139. All computer equipment and internet access within the home/school/college is subject to 'parental 1167
controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social 1168
media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons 1169
during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the 1170 many
learning and social opportunities available through the internet and social media.

1171 6.140. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST 1172
neither mention Cambian Essex School or refer to their employment at the school. Staff are advised not 1173 to
communicate with parents, guardians, carers or Individuals via social networking sites 1174**Photography and images**

1175 6.141. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1176 6.142. The vast majority of people who take or view photographs or videos of Individuals do so for entirely 1177
innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through 1178
taking or using images, so we have some safeguards in place.

1179 6.143. To protect our children, young people or young adults we will:

- 1180 • seek their consent for photographs to be taken or published (for example, on our website or in
- 1181 newspapers or publications)
- 1182 • seek parental consent of consent from the Individual

- 1183 • not use their full name with an image, only their initials
- 1184 • ensure that personal data is not shared
- 1185 • store images appropriately, securely and for no longer than necessary
- 1186 • only use school equipment, i.e. not personal devices
- 1187 • encourage our children, young people and adults to tell us if they are worried about any photographs
- 1188 that are taken of them

1189 **Physical intervention and use of reasonable force**

1190 6.144. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are 1191 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention** 1192 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed, 1193 recorded and monitored.

1194 **Staff Taking Medication or other substances**

1195 6.145. Staff members must not be under the influence of alcohol or any other substance which may affect their 1196 ability to care for the Individuals. If they are taking medication they should seek medical advice and 1197 inform the Home Manager/Head/Principal who will review the medical advice and take a decision as to 1198 whether they are fit for work.

1199 6.146. We only allow staff to work if medical advice confirms that their ability to look after Individuals is unlikely 1200 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it 1201 must be securely stored and out of reach of all children, young people and young adults. This section 1202 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**. 1203 **Information for individuals and relatives/carers**

1204 6.147. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt 1205 with independently and that they will be kept involved in the process to the degree that they wish to be. 1206 They will be reassured that they will receive help and support in acting.

1207 6.148. They will also be advised that they can nominate an advocate or representative to speak and act on their 1208 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could 1209 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be 1210 appointed. They will be advised of rights to legal aid in where appropriate to victim support and 1211 compensation.

1212 **Recruitment and vetting**

1213 6.149. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2**. 1214 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1247 1215 Certificates. HTs / Principals, DSLs and member of Recruitment team
248 including those directly supporting 1216 schools should read the whole KCSIE 2023 guidance including Part 3 dedicated
249 to Safer Recruitment.

250 1217 6.150. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply 1218
251 teaching and teacher trainees, agency care staff as well as multisite managers and members of the 1219 proprietor body.
252 This is regularly audited by the school/college SLT and available for inspection.

253 1220 6.151. For agency workers we obtain written confirmation that all checks have been completed, in line with 1221
254 safer recruitment from the employment business that is supplying the member of agency staff. All 1222 Locations must
255 ensure that an agreement exists between the Location and the agency to confirm that, in 1223 the event of there being
256 a disclosure on a DBS certificate, the Location will have sight of the certificate 1224 before that person can begin work at
257 the home/school/college.

258 1225 6.152. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately
259 to the
260 1226 agency.

261 1227 6.153. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject
262 to the 1228 same recruitment regulations and procedures as the education staff.

263 1229 **Requirements to inform Disclosure and Barring Services (DBS)**

264 1230 6.154. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the
265 1231 barred lists is required.

266 1232 6.155. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one 1233
267 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to 1234
268 safeguarding concerns, or would have been had they not resigned.

269 1235 6.156. In the case of a member of teaching staff at a school or sixth form college, the case manager must 1236
270 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching 1237 [\(paragraph 143](#)
271 [for further information\)](#).

272 1238 6.157. Referrals to the Disclosure and Barring Service will be made for any person (whether employed, 1239
273 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she 1240 is considered
274 unsuitable to work with children and young people.

275 1241 6.158. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail
276 is
277 1242 provided at paragraph 179.

278 1243 6.159. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they
279 can 1244 ensure any future references are correct. The references team log referrals so this can be
280 completed. This 1245 will apply to both: DBS and TRA.

281 1246 **Record-keeping**

282 6.160. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is
283 made, staff must keep clear and accurate records using a Concern Form.

284 6.161. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in
285 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns
286 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch
287 have Concern/Safeguarding function to record any concerns being raised. A report per child/young
288 person can also be generated.

289 6.162. Records should be factual, accurate, concise, ethical and relevant.

- 1291 1290 6.163. All recording of written information should be legible and discussions with other professionals and agencies should be recorded chronologically.
- 1292 6.164. There will be a safeguarding section/folder for each Individual which will hold any concerns/safeguarding
1293 documentation for that individual. At the front of each folder there is an Index for Individual's Concerns.
1294 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1260 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure location.

1262 6.165. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of 1263 Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information 1264 where the concern has escalated. Where this is held as a paper version this is to be made into a bound 1265 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies 1266 only. In either case this should be kept in a secure location. 1267

Monitoring 1268 6.166. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded, 1269 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section 1270 9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators 1271 (KPIs) using **Cambian KPI** and the identification and management of safeguarding risks. A report on the 1272 position of every site in relation to their KPIs is produced every Wednesday.

1273 Training

1274 6.167. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction 1275 introduces the new staff member to the policy, procedure and practice at the location. They will also be 1276 orientated as to where to find information regarding safeguarding including relevant posters around the 1277 location. As part of their induction all staff are required to read this policy and confirm that they 1278 understand their role in safeguarding and protecting young people within the service they are going to 1279 work.

1280 6.168. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must 1281 be completed as part of staff member induction and annually thereafter. This should include online 1282 safety. This is to maintain staff awareness of their responsibilities in relation to children /young 1283 people/young adult's safeguarding.

1284 6.169. Staff will not be allowed to work with Individuals unless they have completed the above training. The 1285 school/college/home must check that supply/agency staff have completed basic awareness training 1286 before being allowed into contact with Individuals.

1287 6.170. Contractors and others on site who might have unsupervised access to Individuals must also complete 1288 basic awareness training before being allowed to start work.

1289 6.171. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and 1290 practice throughout the year. This can be undertaken in various forums: as a face to face or online 1291 session, staff meetings or workshops. In addition to this safeguarding updates are provided to schools 1292 and colleges by the external Safeguarding Network.

1293 6.172. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge 1294 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA 1295 within the boundaries they operate and be refreshed at least every two years. Both should also undertake 1296 Prevent awareness training.

1297 Confidentiality and information sharing

1298 6.173. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting 1299 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear 1300 powers to share, hold and use information for these purposes. Staff should be proactive in sharing 1301 information as early as possible to help identify, assess and respond to risks or concerns about the safety 1302 and welfare of children/ young people whether this is when problems are first emerging, or where a child 1303 is already known to local authority children's social care.

1304 6.174. Where the police are involved, wherever possible the school should ask the police to obtain consent from

1305 the individuals involved to share their statements and evidence
for use in the employer's disciplinary

1307 1306 process. This should be done as their investigation proceeds and will enable the
1308 police to share relevant information without delaying the conclusion of their investigation or any court case.

1309 6.175. The Safeguarding authority should adopt a similar procedure when making enquiries to
1310 determine whether the child or children named in the allegation are in need of protection or
1311 services, so that any information obtained in the course of those enquiries which is relevant to
1312 a disciplinary case can be passed to the employer without delay.

1313 6.176. The case manager should take advice from the LADO, police and Safeguarding Authority to agree
1314 the following:

- 1315 • who needs to know and exactly what information can be shared;
- 1316 • how to manage speculation, leaks and gossip
- 1317 • what, if any, information can be reasonably given to the wider community to reduce speculation;
1318 and
- 1319 • how to manage press interest if, and when, it should arise.

1320 6.177. Exchange or disclose of personal information with other agencies will be completed in
1321 accordance with **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all
1322 relevant legislation including the Data Protection Act 2018 and GDPR which places duty on
1323 organisations and individuals to process personal information fairly and lawfully and to keep the
1324 information they hold safe and secure.

1325 6.178. Information relating to individual Safeguarding cases is confidential, although some information
1326 can be shared with relevant staff. This should be done only on a ‘need to know’ basis.

1327 6.179. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant
1328 data protection principles, which allow them to share (and withhold) personal information, as
1329 provided for in the Data Protection Act 2018 and the GDPR. This includes:

- 1330 • being confident of the processing conditions which allow them to store and share information for
1331 safeguarding purposes, including information which is sensitive and personal, and should be treated
1332 as ‘special category personal data’.
- 1333 • understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that
1334 allows practitioners to share special category personal data. This includes allowing practitioners to
1335 share information without consent where there is good reason to do so, and that the sharing of
1336 information will enhance the safeguarding of a child in a timely manner but it is not possible to gain
1337 consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent
1338 would place a child at risk.
- 1339 • for schools, not providing pupils’ personal data where the serious harm test under the legislation is
1340 met. For example, in a situation where a child is in a refuge or another form of emergency
1341 accommodation, and the serious harms test is met, they must withhold providing the data in
1342 compliance with schools’ obligations under the Data Protection Act 2018 and the GDPR. Where in
1343 doubt schools should seek independent legal advice.

1344 6.180. When sharing safeguarding information regarding an individual, staff will need to consider the
1345 following:

- 1346 • Information should only be shared on a ‘need to know’ basis when it is in the best interests
1347 of the individual
- 1348 • Informed consent should be obtained but, if this is not possible and other adults are at risk
1349 of abuse or neglect, it may be necessary to override the requirement

- 1350 • Distinguish fact from opinion
- 1351 • Ensure you are giving the right information about the right person
- 1352 • Ensure you are sharing information securely
- 1353 • Inform the person that the information has been shared if they were not already aware of
1354 this and if it would not create or increase risk of harm to them/others.
- 1355 6.181. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the
1356 purposes of keeping children safe. Fears about sharing information must not be allowed to
1357 stand in the way of the need to safeguard and promote the welfare and protect the safety of
1358 children.
- 1359 6.182. Further details on information sharing can be found in:
- 1360 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting
1361 guide to information sharing
- 1362 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children,
1363 Young People, Parents and Carers](#). The seven golden rules for sharing information will be
1364 especially useful
- 1365 • [The Information Commissioner’s Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance
1366 from the department
- 1367 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection
1368 activity, including compliance with the GDPR.
- 1369 6.183. The following wording is to be added to any covering letter where we are sharing
1370 documentation:
- 1371 *“The material contained in this letter and its enclosures are confidential to Cambian Group and the
1372 persons named within the documentation. The documentation is delivered only in accordance
1373 with a perceived legal obligation to make the documentation available and upon the strict
1374 understanding that the recipient and all members of the recipient’s staff will undertake to
1375 preserve confidentiality and not in any way share the documentation or any details of the
1376 information therein contained with any other party. Any person receiving this information who
1377 breaches these obligations of confidentiality will be held strictly responsible and will be expected
1378 to indemnify Cambian Group and any persons named within the documentation against any
1379 losses that may arise as a result of misuse of this material”.*
- 1380 6.184. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact
1381 details for the Caldicott Guardian at our location is Sarah Longley Cook- Clinical Director
- 1382 6.185. Failure to follow this policy and local procedure may result in disciplinary action.
- 1383 **1376 Complaints and Monitoring**
- 1384 1377 6.186. All complaints arising from the operation of this policy will be considered under the **0.22 complaints
1385 procedure**, with reference to our Designated Safeguarding Officer who is Karen Carrington (DSL) and 1379
1386 [Suffolk County Council] Safeguarding Children’s Board
- 1387 **1380 7. Accountability**
- 1388 1381 7.1. Karen Carrington is the DSL at Cambian Dunbroch School and has lead responsibility for protecting and
1389 1382 safeguarding children, young people and young adults and liaising with the local authority and other local
1390 agencies as appropriate. This includes young person protections, referrals, raising awareness, training, allocating
1391 resources and supporting/directing staff within the Location. In all matters relating to young person protection
1392 and safeguarding the school will follow the procedures outlined in this policy.
- 1393 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by
1394 the Head of Service. Our Managing Director, Andrew Sutherland will undertake a full annual review of

- 1395 the content and effective application of this policy and associated procedures.
1396 The date for the next scheduled review is set out on page 2. The policy will be reviewed earlier in
1397 accordance with changes in legislation, regulatory requirements or as a result of best practice guidance.
- 1398 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director Compliance,
1399 who will support and promote the development of initiatives to improve the prevention, identification
1400 and response to abuse and neglect. As the Director accountable for safeguarding, she is also responsible
1401 for reporting on safeguarding and providing executive leadership.
- 1402 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1403 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can
1404 be stressful and distressing for staff.
- 1405 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,
1406 allied health professionals and nurses) should understand how their professional standards and
1407 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.
- 1408 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1409 need to share a common view of what types of behaviour may be abuse or neglect and what should be
1410 an initial response to suspicion or allegation of abuse or neglect.
- 1411 7.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency safeguarding
1412 policy as this policy is designed to complement rather than replace the multi-agency policies which define
1413 the local practice that must be followed.
- 1414 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1415 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact
1416 names and details if required.

1417 8. Further Safeguarding information – what everyone needs to know 1418 (Appendix 11)

- 1419 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours
1420 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual
1421 and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are
1422 1415 at risk. Other safeguarding issues such as peer on peer (child on child) abuse all staff should be aware of
1423 1416 are explored in the **Appendix 11. Further Safeguarding information – what everyone needs to know.**

1424 1417 9. Appendices

1425 1418 Appendix 1: Relevant policies and documents

- 1426 1. Child Protection and Safeguarding
- 1427 a) 25.01 - Index Form for Individuals Concern File
 - 1428 b) 25.02 - Abuse Poster Individual
 - 1429 c) 25.03 - Individual Safeguarding booklet – Easy Read
 - 1430 d) 25.04 - Concern Form
 - 1431 e) 25.05 - Safeguarding Tracking Pack
 - 1432 f) 25.06 – Visitor Information Leaflet template
 - 1433 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
 - 1434 h) 25.08 – Guidance to staff who had an allegation made against them

- 1435 i) 25.09 – Local Safeguarding procedure
- 1436 j) 25.10 – Staff Safeguarding Information poster
- 1437 k) 25.11 – Guidance notes for Designated or On call person
- 1438 l) 25.12 – Static body chart
- 1439 m) 25.13 – Weekly body chart
- 1440 n) 25.14 – Guidance for Investigating Unexplained Body Marks
- 1441 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1442 **2.** Whistleblowing
- 1443 **3.** Anti-bullying
- 1444 **4.** Child Sexual Exploitation
- 1445 **5.** Intimate and Invasive Care
- 1446 **6.** Self-harm and suicide
- 1447 **7.** Behaviour Support
- 1448 **8.** Physical Intervention
- 1449 **9.** Complaints Policy
- 1450 **10.** Health
- 1451 **11.** E –safety
- 1452 **12.** Capacity to consent
- 1453 **13.** Prevent
- 1454 **14.** Recruitment
- 1455 **15.** Code of Conduct
- 1456 **16.** Data Protection
- 1457 **17.** Confidentiality
- 1458 **18.** E- safety
- 1459 **19.** Disciplinary
- 1460 **20.** Complaints
- 1461 **21.** Code of Practice
- 1462 **22.** Mobile telephony
- 1463 **23.** SUI Caretech children’s services process
- 1464 **24.** Caretech - Group Leaving Policy
- 1465 **25.** GHR 02 – Harassment and Bullying
- 1466 **26.** GHR 41 – Reference Requests

1467 **27.** GHR 41.1 DBS referral log1468
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1471 1485 **Appendix 2: Legislation and guidance**

- 1472 • [The Children Act 2004, as amended by the Children and Social Work Act 2017](#)
- 1473 • [Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes](#)
- 1474 [\(England\) Regulations 2015 in force as of 1st April 2015](#)
- 1475 • [Guide to the Young people's/care home Homes Regulations including the Quality Standards](#)
- 1476 [\(DfE: April 2015\)](#)
- 1477 • This policy is also in accordance with the Local Safeguarding Young People Board (LSCP) locally
- 1478 agreed inter-agency safeguarding processes and procedures
- 1479 • [Prevent Duty Guidance: for England and Wales \(March 2015\) \(Prevent\). Prevent is](#)
- 1480 [supplemented by The Prevent duty: Departmental advice for schools and young person minders](#)
- 1481 [\(June 2015\) and The use of social media for on-line radicalisation \(July 2015\)](#)
- 1482 • [The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2015](#)
- 1483 • [Female Genital Mutilation Act 2003, \(as inserted by section 74 of the Serious Crime Act 2015\)](#)
- 1484 • [Terrorism Act 2000](#)
- 1485 • [Counter Terrorism and Security Act 2015](#)
- 1486 • [The School staffing regulations, England 2009](#)
- 1487 • [The Teachers Disciplinary regulations, 2012](#)

- 1488 • [Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.](#)
- 1489
- 1490 • [All Wales Child Protection Procedures 2008](#)
- 1491 • [All Wales POVA Guidance 2008](#)
- 1492 • [Keep learners Safe 2015](#)
- 1493 • [The Care Act 2014](#)
- 1494 • [Social services and wellbeing Act 2014](#)
- 1495 • [Working Together to Safeguard Children 2018](#)
- 1496 • [Keeping Children Safe in Education 2022](#)
- 1497 • [Keeping Children Safe in Education Part One 2022](#)
- 1498 • [Regulated activity in relation to children: scope](#)
- 1499 • [What to do if you're worried a child is being abused](#)
- 1500 • [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- 1501 • [Violence against women and girls](#)
- 1502 • [https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/](https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/Teaching_online_safety_in_school.pdf)
- 1503 [Teaching online safety in school.pdf](https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/Teaching_online_safety_in_school.pdf)
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- 1514 1529 **Appendix 3: Child Protection and safeguarding procedure (Flow chart)**

1530 DSL– DSL

CSC– Children’s Social Care

1531 CAF – Common Assessment framework

LADO – Local Authority Designated Officer

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1533

1534

Child / Young Adult

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S 1536

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1539 Consistent explanation or Suspected physical injury, or any report of Disclosure/allegation of Allegation against staff

1540

minor accident alleged abuse, including

peer on peer including peer on peer
volunteer/other third party sexual
abuse/harassment

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1542

In an emergency dial 999, otherwise:

A 1543

1544

1545

1546 Make a note, keeping all Serious incident or recurrent episodes or Avoid asking leading questions/young adult, don't

1547

original hand written notes

inconsistent explanations

promise

confidentiality, but provide reassurance

1548

1549

1550

REPORT within 1 hour to the DSL or DSL Deputy (if DSL is not

1551

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

available). In Education concerns/allegations against staff are

to be referred to the Head/Principal.

specific people

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Record all details on **Concern Form** and pass it on to the DSL/Deputy/Head/Principal if related to staff. Use body map to record

1557

visible injuries. NB. This is recorded by the first person the child/anyone else spoke to as soon as possible/no longer than 24 hours.

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1560

DSL /Deputy/ Head/Principal will have access to the necessary information:

1561

Name/Address/DOB/Siblings/GP and any other information held. The designated safeguarding lead/ Monitor the

1562

Head/Principal will make an initial assessment of the situation and follow the most appropriate route. situation

D 1563

1564

1565

If it is a safeguarding concern the next sequential Safeguarding Log number will be allocated/ services 1566

Work with the family

local Safeguarding Authority/LADO contacted as per Local Safeguarding Protocol. Designated using

Behaviour Watch: the concern number will be given by the system once concern is recorded, and

1567

through the CAF

safeguarding lead or Head/Principal (depending who will lead on the case) will follow advice from any of

1568

process where

the professional above. If a safeguarding concern is confirmed then a safeguarding process **MUST** be

1569

applicable

followed and Safeguarding Tracking Pack is opened/Services using Behaviour Watch: Concern slip has a

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Safeguarding Tracking pack built in.

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DSL or Head/Principal to inform those that n and record details. DSL **MUST** ensure that it **continuously** updated to reflect on advice re taken. Receive feedback from Safeguarding at social worker if the case beco

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

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Appendix 4: Types of abuse – children

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1583 • **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 illtreatment 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 is a specific safeguarding issue (also known as peer on peer abuse) 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 their peers 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.

1635 **Appendix 5: Types of abuse - adults**

- 1636 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding
1637 and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully
1638 uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding or withholding food,
1639 unauthorized restraint, restricting movement.
- 1640 • **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the honour
1641 of the family and/or the community including female genital mutilation (FGM), forced marriage and practices such
1642 as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family
1643 or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and
1644 additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse
1645 (regardless if the motivation) and should be handled and escalated as such. Professionals in all agencies, individuals
1646 and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already
1647 having suffered
1648 HBA.
- 1649 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse outlined in
1650 this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence and abuse include
1651 any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between
1652 those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality.
- 1653 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual
1654 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the
1655 vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking,
1656 sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing
1657 of sexual acts, Indecent exposure.
- 1658 • **Sexual harassment**- unwanted conducts of a sexual nature that can occur online and offline, sexual harassment is
1659 likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated, and/or create a
1660 hostile, offensive or sexualised environment.
- 1661 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing services,
1662 educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally
1663 leaving someone unattended when they need assistance, preventing someone from meeting their religious and
1664 cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation,
1665 meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying,
1666 swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or
1667 abandonment, cyber bullying.
- 1668 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from accessing their
1669 own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress,
1670 threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial
1671 transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to
1672 manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care
1673 home, misuse of benefits or direct payments in a family home, someone moving into a person’s home and living
1674 rent free without agreement or under duress, false representation, using another person's bank account, cards or
1675 documents, exploitation of a person’s money or assets, e.g. unauthorised use of a car, misuse of a power of
1676 attorney, deputy, appointeeship or other legal authority.
- 1677 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work,
1678 prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never
1679 will be able to.
- 1680 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and civil
1681 partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as ‘protected
1682 characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks or inappropriate use of language
1683 related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter,
1684 signer or lip-reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic
1685 rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard
1686 service provision relating to a protected characteristic.

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1687 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, rundown 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.

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- **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.

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- **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.

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1719 Appendix 6: Signs that someone could be a victim

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Physical abuse

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- 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

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Sexual abuse

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- 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

- 1736 • Not wanting to be alone with a particular person

1737 **Psychological or emotional abuse**

- 1738 • An air of silence when a particular person is present
- 1739 • Withdrawal or change in the psychological state of the person
- 1740 • Insomnia (not sleeping)
- 1741 • Low self-esteem
- 1742 • Uncooperative and aggressive behaviour
- 1743 • A change of appetite, weight loss or gain
- 1744 • Signs of distress: tearfulness, anger
- 1745 • Apparent false claims by someone involved with the person, to attract unnecessary treatment

1746 **Neglect and acts of omission**

- 1747 • Poor environment – dirty or unhygienic
- 1748 • Poor physical condition and/or personal hygiene
- 1749 • Pressure sores or ulcers
- 1750 • Malnutrition or unexplained weight loss
- 1751 • Untreated injuries and medical problems
- 1752 • Inconsistent or reluctant contact with medical and social care organizations
- 1753 • A build-up of medication that hasn't been taken
- 1754 • Uncharacteristic failure to engage in social interaction

1763 Unsuitable clothing or not enough clothes

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Domestic abuse

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- becoming anxious or depressed

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- having difficulty sleeping

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- complaining of physical symptoms such as tummy aches

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- starting to wet their bed

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- behaving as though they are much younger than they are

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- having problems with school

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- becoming aggressive or they may internalize their distress and withdraw from other people

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- having a lowered sense of self-worth

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

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

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Peer on Peer abuse

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- absence from school or disengagement from school activities

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- physical injuries

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- mental or emotional health issues

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- becoming withdrawn – lack of self esteem

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- lack of sleep

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- alcohol or substance misuse

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- changes in behavior

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- inappropriate behavior doe age

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- abusive towards others

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1821 1820 **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.

- 1865 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is**
 1866 **related to staff) – actions, reporting**
 1867 **and recording procedure**
- 1868 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1 hour from
 1869 the moment of disclosure/report from the child/young person/other person, completes and passes the Concern
 1870 form as soon as it is possible, but no later than 24hrs from the moment of disclosure/report. If the DSL is
 1871 unavailable, passes it on to the DSL Deputy. In Education, if the concern is related to the staff and the
 1872 Head/Principal is not available, staff must report their concern to the DSL instead, so there is no delay in reporting
 1873 of the concern. The DSL will then liaise with the Head/Principal to agree on the next step. Services using Behaviour
 1874 Watch: staff must report their concern verbally before completing the Concern/Safeguarding slip in the system.
 - 1875 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details on the **25.07.**
 1876 **Central Log of Concerns and Safeguarding** and inserts the concern reference number on the Concern Form.
 1877 Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the concern and decides on the next
 1878 step which may lead to Safeguarding Tracking Pack being opened (Safeguarding Tracking Pack is built as part of the
 1879 concern slip should the case proceed to safeguarding).
 - 1880 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or
 1881 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on the
 1882 **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and immediately (or at
 1883 least within one hour of receiving the concern form, make a referral to the local Safeguarding Authority and the
 1884 Local Authority Designated Officer (LADO) where required, to discuss the allegation and agree a course of action.
 1885 DSL/DSL Deputy or Head/Principal using the Behaviour Watch system will progress to the next stage – Safeguarding
 1886 part of the concern/SG slip which is only accessible to the Safeguarding Team.
 - 1887 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a safeguarding
 1888 concern, then the date and time of the contact is recorded on the Concern Form and on the Central Log of Concerns
 1889 and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal Investigation. The Head of
 1890 Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their Senior Management Team is
 1891 assigned to look into the concern. The review must be recorded and outcomes shared with the people involved.
 1892 Feedback from the review session MUST be provided to local Safeguarding Authority/LADO. Services using the
 1893 Behaviour Watch system will follow the same set of steps apart from populating the Central Log of Concerns and
 1894 Safeguarding as the log can be generated by the system using chosen filtering criteria.
 - 1895 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken. This
 1896 diligent approach will ensure a clear historic record of contact with local Safeguarding
 1897 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with the local
 1898 Safeguarding Authority/LADO whichever appropriate.
 - 1899 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it requires
 1900 investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must be opened with the
 1901 next sequential Safeguarding Reference included on the form and details as such entered on the central log.
 - 1902 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking Pack being
 1903 opened, a one record will be created including the original concern, with the whole document having the same slip
 1904 number.
 - 1905 • Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the
 1906 **Responsible/Nominated Individual and** in day schools - **Regional Education Manager** as a follow up to the initial
 1907 reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual and Regional**
 1908 **Education Manager** on completion, providing detailed overview of the actions taken and the final outcome.
 1909 Services using the Behaviour Watch will be able to trigger live notification to the Regional Manager
 1910 (Education/Care), Responsible/Nominated Individual and Registered Manager – where appropriate. The
 1911 **Responsible/Nominated Individual and Regional Education Manager** in day schools
- 1912 will update relevant Directors. This original form will be saved in the Safeguarding file/Behaviour Watch –
 1913 Concern/SG module.

- 1914 • In the case of serious harm, and/or the child/young person or young adult
915 is in immediate danger the local Police should be informed immediately as well and they can take immediate
916 protective action as necessary.
- 917 • If the matter is a more general concern then ensure that the 'Action Taken' log on the concern form is completed
918 and the form is filed within the Safeguarding file. Either way the form must be signed by the DSL/DSL Deputy or
919 Head/Principal. Services using the Behaviour Watch system can use Concern/Safeguarding 'Other' slip to record
920 concerns which are not related to children/young people, staff or children/young people and staff.
 - 921 • The relevant concern form should be referenced in the Individual's **25.01 Index form for Individual**
922 **concern/safeguarding file** and the site's **25.07 Central Log of Concerns and Safeguarding**. Services using Behaviour
923 Watch will be able to filer information per chosen criteria and also generate reports per each child/young person
924 in the school, college, children's or care homes.
 - 925 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack**
926 **/Behaviour Watch Concern/SG module**.
 - 927 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed in writing that
928 the concern is closed and Responsible/Nominated Individual and Regional Education Manager in day schools has
929 signed the Safeguarding tracking pack to confirm that the investigation is completed in full and can be closed. **The**
930 **Safeguarding will remain open until both elements of sign-off have been completed**. **Once the Safeguarding**
931 **tracking Pack is signed, it MUST be filed in the Safeguarding file**.
 - 932 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local Authority
933 and/or the police. The individual can be kept in their care home or on the school/college site fully supported (e.g.
934 if they are a day student) if advised to do so.
 - 935 • The parent/carers should be informed and a decision should be made with the Local Authority and the Police about
936 what action is to be taken and whom by.
 - 937 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been said by
938 others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse referral
939 but may help to clarify the situation but they must record all details of any conversation and advice received on a
940 concern form. He/she can then move to a formal referral or actively monitor the situation.
 - 941 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or allegation of
942 abuse directed against anyone working within the establishment. The establishment MUST not internally
943 investigate any allegations of abuse without first taking instruction from the local Safeguarding Authority/LADO.
 - 944 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal management
945 investigation (level 2), the investigation process will commence.
 - 946 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the external agency
947 (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to assist the external agency
948 to ensure the investigation is completed without a delay.
 - 949 • Registered Manager MUST notify relevant regulator by submitting specific statutory notification within the time
950 frame specified by their regulator. This is regardless of who leads on the investigation and whether or not the
951 investigation has been concluded.
 - 952 • If as the result of an investigation there has been a substantiated allegation against a member of staff, we will work
953 with the local Safeguarding Authority/LADO to determine whether there are any improvements to be made to our
954 safeguarding policy, procedures and practice to prevent similar events

955 in the future. Also, we will work with our internal Human Resources department and may commence
956 proceedings under **GHR 27. Disciplinary policy and procedure**.
 - 957 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police. Records are
958 kept of all conversations as part of the investigation process and made available as required.

1959

1960 2001 **Appendix 9: Key contacts**

1961 2002

1962 2003 **DSL & Headteacher is** Karen Carrington

1963 2004 **Telephone:**

1964 karen.carrington@cambiagroup.com

1965 2005

Email:

1966	2006	
967	2007	DSL Deputy is
968	2008	Telephone: Email: 2009
969		
970	2010	
971	2011	Outside of hours please refer to your school/home on- call rota and 24/7 contact number which can be
972	found: 2012	Telephone (24hrs) 07501400422 Email: karen.carrington@cambiagroup.com 2013
973	2014	Operations Director is Kicha Mitchell
974	2015	Telephone 07711766176 Email:
975		kicha.mitchell@cambiagroup.com
976	2016	
977	2017	Managing Director is Andrew Sutherland
978	2018	Telephone 077123 14278 Email: Andrew.sutherland@cambiagrup.com
979	2019	
980	2020	Group Executive Director – Children’s Services is Jeremy Wiles
981	2021	Telephone: 079190232207 Email: Jeremy.Wiles@caretech-uk.com
982	2022	
983	2023	Organisation’s Strategic Safeguarding Lead is Amanda Sherlock - Group Executive Director - Compliance
984	2024	Telephone : 01707 601 800 Email: Amanda.Sherlock@caretech-uk.com
985	2025	
986	2027	Representative, Proprietor - Caretech Education Services is Andrew Sutherland – MD of Education
987	Services 2027	Telephone : 07701314378 Email: Andrew.Sutherland@caretech-uk.com
988	2028	
989	2029	Local Safeguarding Authority
990		<ul style="list-style-type: none">• Suffolk Safeguarding Partnership, Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX
991		<ul style="list-style-type: none">• General enquiries: enquiries@suffolksp.org.uk Tel: 0808 800 4005
992		<ul style="list-style-type: none">• Office hours: Monday to Thursday 9:00am-5:15pm, Friday 9:00am-4:00pm
993		<ul style="list-style-type: none">• Out of hours or bank holidays, call the emergency duty team on 0808 800 4005
994		<ul style="list-style-type: none">• Police 999
995		<ul style="list-style-type: none">• The non-emergency police telephone number is: 101 2036For young people under the age of 18:
996	2037	The Local Authority Designated Officer (LADO)
997	2038	The LADOs for Suffolk County Council are based within the Children's Safeguarding Team. They can be contacted by
998	2039	phone on 0300 123 2044 or by e-mail: LADO@suffolk.gov.uk
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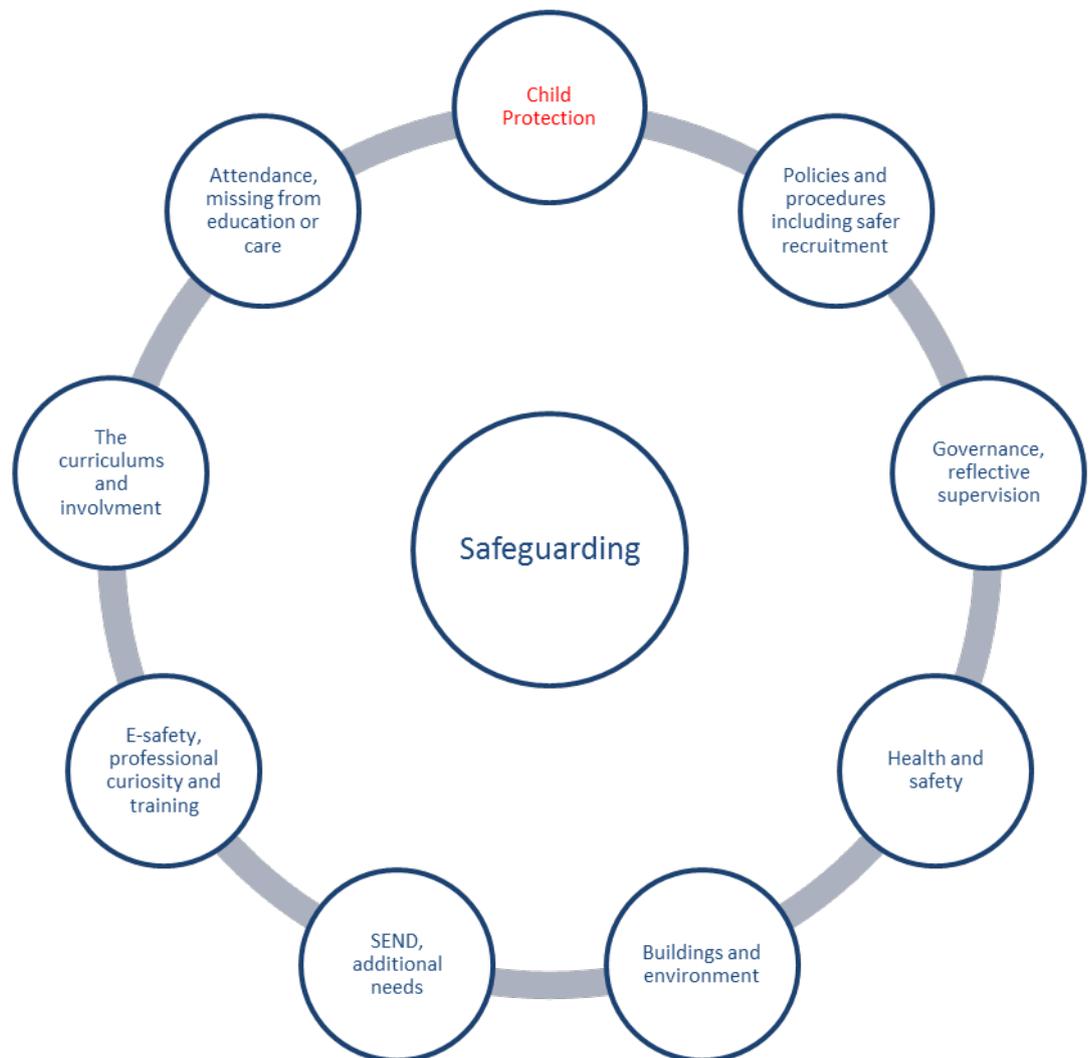
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2062 **Appendix 10. Safeguarding in children’s Services - illustration**

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 2105 2087 **Appendix 11. Further Safeguarding information – what everyone needs to know**

 2106 **Contextual safeguarding**

 2107 9.1. Contextual Safeguarding is ‘an approach to understanding, and responding to, young people’s experiences
 2108 of significant harm beyond their families. It recognises that the different relationships that young people
 2109 form in their neighbourhoods, schools, colleges, children’s/care homes and online can feature violence
 2110 and abuse. Parents and carers have little influence over these contexts, and young people’s experiences
 2111 of extra-familial abuse can undermine parent-child relationships. Therefore children’s social care
 2112 practitioners need to engage with individuals and sectors who do have influence over/within extra-
 2113 familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part
 2114 of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection
 2115 systems in recognition that young people are vulnerable to abuse in a range of social contexts’.

 2116 9.2. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors
 2117 outside the school and/or can occur between children outside of these environments. All staff, but
 2118 especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in
 2119 situations outside their families. Extra-familial harms take a variety of different forms and children can
 2120 be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation,
 2121 and serious youth violence (KCSIE 2023). Further advice for schools and colleges is provided in the [Home
 2122 Office’s Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and
 2123 vulnerable adults: county lines guidance](#)

 2124 9.3. Children’s social care assessments should consider where children are being harmed in contexts outside the
 2125 home (family home, children’s/care home), so it is important that schools, colleges and children’s/care
 2126 homes provide as much information as possible as part of the referral process. This will allow any
 2127 assessment to consider all the available evidence and enable a contextual approach to address such
 2128 harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

 2129 9.4. We will consider the various factors that have an interplay with the life of any child/young person about
 2130 whom we have concerns within the setting and the level of influence that these factors have on their
 2131 ability to be protected and remain free from harm particularly when it comes to child exploitation or
 2132 criminal activity.

 2133 9.5. Whilst this term applies to this specific definition, the notion of considering a child/young person within
 2134 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the
 2135 school, college, children’s/care home gates, within their family home when they visit (children
 2136 attending residential education), within the family (day students) and within the community

2137 (extracurricular off site activities, events, groups and clubs) are key considerations when the DSL is looking at any concerns.

Bullying

9.6. 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 take action to protect Individuals where appropriate.

Peer on peer (child on child) abuse

9.7. 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 peer on peer abuse, 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.

9.8. All staff should be aware that children can abuse other children (often referred to as peer on peer abuse) 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 peer on peer 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 person who may have potentially been the victim of Peer on Peer abuse and who instigated it.

9.9. 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.

9.10. 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.

9.11. The communication with each child throughout the process of Peer on peer abuse investigation must be regular, proportionate and take place using suitable communication.

9.12. 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 peer on peer 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

- 2180 • to ensure the behavioural approach with sanctions & interventions for
2181 poor behaviour
- 2182 • to have mechanisms to support students who need it in the way they need it
- 2183 • to ensure staff have access to suitable training & that there are clear expectation for staff and Managers
- 2184 • to ensure pupil’s voice in heard and responded to
- 2185 • to ensure DSLs have some protected time to engage with local safeguarding partners and LADOs, so those
2186 relationships can be strengthened
- 2187 • to ensure staff follow the guidance in Keeping Children Safe in Education
2188
- 2189 9.13. All staff should understand, that even if there are no reports in their schools or colleges it does not mean
2190 it is not happening, it may be the case that it is just not being reported. As such it is important if staff have
2191 any concerns regarding peer on peer abuse they should speak to their DSL (or deputy).
- 2192 9.14. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2193 harassment. Staff must NOT take the view that it doesn’t not happen in their setting. It is essential that all
2194 staff understand the importance of challenging inappropriate behaviours between peers, many of which
2195 are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example
2196 dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being
2197 boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst
2198 case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward
2199 to report it.
- 2200 9.15. The Organisation recognises that it is more likely that girls will be victims and boys’ perpetrators, but that
2201 all peer on peer abuse is unacceptable and will be taken seriously. It is essential that all victims are
2202 reassured that they are being taken seriously and that they will be supported and kept safe.
- 2203 9.16. Peer on peer abuse is most likely to include, but may not be limited to:
2204
- 2205 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - 2206 • abuse in intimate personal relationships between peers
 - 2207 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
2208 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - 2209 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2210 element which facilitates, threatens and/or encourages sexual violence). For further information about
2211 sexual violence see [Annex B.](#)
 - 2212 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may
2213 be standalone or part of a broader pattern of abuse; For further information about sexual harassment see
2214 [Annex B.](#)
 - 2215 • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
2216 themselves sexually, or to engage in sexual activity with a third party
 - 2217 • consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as
2218 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance: [Sharing
2219 nudes and semi-nudes advice for education settings.](#)
 - 2220 • Upskirting (For further information about upskirting see Annex B) which typically involves taking a picture
2221 under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks
2222 to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- 2223 9.17. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2224 humiliation used as a way of initiating a person into a group and may also include an online element)

2225 9.18. Staff must be clear as to the school/college's/home's procedures
226 with regards to peer on peer abuse and the important role they have to play in preventing it and
227 responding where they believe a child may be at risk from it.

228 9.19. All Individuals will be provided with safeguarding information in a format which is appropriate for their
229 understanding and communication. This may take the form of posters or a leaflet/booklet.

230 9.20. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
231 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be
232 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
233 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or
234 acceptable. However, it is critical to state that some children with cognitive impairment may not be able
235 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will work
236 with each of the children affected by the situation in order to enhance their understanding of the
237 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

238 Serious violence

239 9.21. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious
240 violent crime. These may include increased absence from school, a change in friendships or relationships with older
241 individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing,
242 or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children
243 have been approached by, or are involved with, individuals associated with criminal networks or gangs and may
244 be at risk of criminal exploitation.

245 9.22. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence,
246 such as being male, having been frequently absent or permanently excluded from school, having experienced child
247 maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is
248 provided in the Home Office's Preventing youth violence and gang involvement and its [Criminal exploitation of](#)
249 [children and vulnerable adults: county lines guidance](#).

250 9.23. Sexual violence and sexual harassment between children can occur between two children of **any age and sex from**
251 **primary to secondary stage and into colleges. It can also occur online.** It can also occur through a group of children
252 sexually assaulting or sexually harassing a single child or group of children.

253 9.24. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and
254 distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the
255 alleged perpetrator(s) attends the same school or lives in the same children's/care home. Sexual violence and
256 sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically
257 and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of 'it
258 could happen here'.

259 9.25. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and
260 kept safe. **A victim should never be given the impression that they are creating a problem by reporting sexual**
261 **violence or sexual harassment.** Nor should a victim ever be made to feel ashamed for making a report.

262 9.26. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are
263 protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is
264 also important that other children, adult students and school and college staff are supported and protected as
265 appropriate.

266 9.27. There is support available for schools and colleges. Paragraph 52 and Annex A in the [Sexual Violence and Sexual](#)
267 [Harassment Between Children in Schools and Colleges](#) advice provides detailed information and links to
268 resources.

269 9.28. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special
270 educational needs and disabilities (SEND) and LGBT children are at greater risk.

271 9.29. Staff should be aware of the importance of:

- 2272 • challenging inappropriate behaviours;
- 2273 • making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is
2274 not an inevitable part of growing up;
- 2275 • not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just
2276 having a laugh” or “boys being boys”; and
- 2277 • challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and
2278 genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours
2279 risks normalising them.
- 2280 9.30. Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to
2281 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is
2282 developmentally inappropriate and may cause developmental damage. An umbrella term for these
2283 types of behaviour are often referred to as “**harmful sexual behaviour**”. The term has been widely
2284 adopted in child protection. Harmful sexual behaviour can occur online and/or offline and can also occur
2285 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection
2286 context.
- 2287 9.31. Situations where children/young people are forced or coerced into sexual activity by peers or associates
2288 can be related with gang / serious youth violence activity but that is not always the case. Peer influence
2289 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many
2290 young people see it as a “way out” from their day to day life and feel a strong bond with their peers, one
2291 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying include:
- 2292 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that makes
2293 a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour,
2294 ethnicity, culture, faith community, national origin or national status.
- 2295 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender is
2296 used as a weapon by boys or girls, this may also include any of the following:
- 2297 - spreading rumors about someone's alleged sex life
- 2298 - using offensive terms to describe a person
- 2299 - inappropriate touching or attempts to do so
- 2300 - non-consensual sharing of sexual images and videos
- 2301 - unwanted sexual comments and messages, including those on social media
- 2302 - any sexual exploitation, coercion and threats
- 2303 - sexual assault and rape
- 2304 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or knowledge, with the intention
2305 of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim
2306 humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism Offences
2307 Act, which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came into force on 12 April
2308 2019.
- 2309 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are transgender, thought to be
2310 transgender, or whose gender expression doesn’t conform to traditional gender roles. Transphobia can prevent
2311 transgender and gender nonconforming people from living full lives free from harm.
- 2312 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual orientation);

2313 • **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 behavior or actions, usually negative, towards an individual or group of people, especially on the basis of sex/race/social class.

9.32. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE 2023/Annex B](#) (pages 139 – 140) and more details about how to respond have been included in [KCSIE 2023 Part 5. Child on child sexual violence and sexual harassment](#).

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

9.33. 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

9.34. 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 DSL/DSL Deputy.

Opportunities to teach safeguarding

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

9.36. Whilst considering the above training requirements, governing bodies and proprietors 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.

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

9.38. 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](#).

9.39. 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. The following resources 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;

2356 • National Crime Agency's CEOP education programme: [Thinkuknow](#);

2357 • Public Health England: [Rise Above](#)

2358 9.40. As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially
2359 harmful and inappropriate online material. Whilst it is essential that governing bodies and proprietors ensure that
2360 appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead
2361 to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

2362 Online safety

2363 9.41. It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective
2364 whole school and college approach to online safety empowers a school to protect and educate pupils, students,
2365 and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns
2366 where appropriate.

2367 9.42. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk
2368 which we'll refer to as 4Cs later on:

2369 • **content:** being exposed to illegal, inappropriate or harmful content, for example:
2370 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and
2371 extremism.

2372 • **contact:** being subjected to harmful online interaction with other users; for example: peer to peer
2373 pressure, commercial advertising and adults posing as children or young adults with the intention to
2374 groom or exploit them for sexual, criminal, financial or other purposes’.

2375 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example,
2376 making, sending and receiving explicit images (e.g consensual and nonconsensual sharing of nudes
2377 and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

2378 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.
2379 If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working
2380 Group <https://apwg.org/>

2381 9.43. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and
2382 implementing policies and procedures. This will include considering how online safety is reflected as required in all
2383 relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and
2384 responsibilities of the DSL and any parental engagement.

2385 Online safety policy

2386 9.44. Online safety and the school or college's approach to it should be reflected in the child protection policy. Considering
2387 the 4Cs (above) will provide the basis of an effective online policy. The school should have a clear policy on the use
2388 of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and
2389 unrestricted access to the internet via mobile phone networks (i.e. 3G,

2390 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile
2391 and smart technology, share indecent images: consensually and non-consensually (often via large chat groups),
2392 and view and share pornography and other harmful content. Schools and colleges should carefully consider how
2393 this is managed on their premises and reflect in their mobile and smart technology policy and their child protection
2394 policy.

2395 9.45. Information and support available to schools and colleges to keep children safe online can be found in [KCSIE 2023](#)
2396 [Annex D](#).

2397

Remote Learning

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

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

Filters and monitoring

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

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

Information security and access management

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

Reviewing online safety

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

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

Information and support

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

Cyberbullying

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

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

2441 • By cyber-bullying, we mean bullying by electronic media:

- 2442 • Bullying by texts or messages or calls on mobile ‘phones
- 2443 • The use of mobile ‘phone cameras to cause distress, fear or humiliation
- 2444 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal
2445 websites, social networking sites
- 2446 • Using e-mail to message others
- 2447 • Hijacking/cloning e-mail accounts
- 2448 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums
- 2449 9.55. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory
2450 information in any media including internet sites.
- 2451 9.56. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public
2452 electronic communications network, a message or other matter that is grossly offensive or one of an
2453 indecent, obscene or menacing character.
- 2454 9.57. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct
2455 amounting to harassment.
- 2456 9.58. If services become aware of any incidents of cyberbullying, they will need to consider each case
2457 individually as to any criminal act that may have been committed. The services will pass on information
2458 to the police if it feels that it is appropriate or is required to do so.

Gaming – raising awareness

2460 9.59. Online gaming is an activity in which the majority of children and young people and many adults get involved. The
2461 services will raise awareness by talking to children/young people/key workers/staff and also where appropriate
2462 parents/carers involved about the games their children play and help them identify whether they are appropriate.

Nudes/semi nudes images or videos

2464 9.60. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends
2465 sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any
2466 device that enables the sharing of media and messages. Sexting may also be called: trading nudes, dirties, pic for
2467 pic.

2468 9.61. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing
2469 it is a child. A young person is breaking the law if they:

- 2470 • take an explicit photo or video of themselves or a friend
- 2471 • share an explicit image or video of a child, even if it’s shared between children of the same age
- 2472 • possess, download or store an explicit image or video of a child, even if the child gave their permission for it to
2473 be created.

2474 9.62. However, if a young person is found creating or sharing images, the police can choose to record that a crime has
2475 been committed but that taking formal action isn’t in the public interest. There are many reasons why a young
2476 person may want to send a naked or semi-naked picture, video or message to someone else:

- 2477 • joining in because they think that ‘everyone is doing it’
- 2478 • boosting their self-esteem
- 2479 • flirting with others and testing their sexual identity

2480 • exploring their sexual feelings

- 481 • to get attention and connect with new people on social media
- 482 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking
- 483 is persistent
- 484 9.63. The risks of sexting are that the young person has no control over the images and how these are shared, and the
- 485 subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide education and
- 486 guidance to prevent individuals from becoming victims of such situations by encouraging them to think about the
- 487 risk of sexting and understand how to seek help when approached to take part in sexting. More information can
- 488 be found on: [Keeping-children-safe/online-safety/sexting-sendingnudes](#).

Online reputation

489

490 9.64. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed by posts,

491 photos that have been uploaded and comments made by others on people's profiles. It is important that

492 children/young people and staff are aware that anything that is posted could influence their future professional

493 reputation. The majority of organisations and work establishments now check digital footprint before considering

494 applications for positions or places on courses.

Grooming

495

496 9.65. On-line grooming is the process by which one person with an inappropriate sexual interest in children/young people

497 will approach a child/young person on-line, with the intention of developing a relationship with that child/young

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

499 9.66. The services will build awareness amongst children/young people, parents/carers and staff about ensuring that the

500 child/young person:

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

504 9.67. Where appropriate that the services will support parents/carers to:

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

508 9.68. Where appropriate the services will raise awareness by:

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

Violence against women and girls (VAWG)

512

513 9.69. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women and girls.

514 The government has a strategy looking at specific issues that women and girls face.

515 9.70. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to equal

516 participation of women and men in social, economic, and political spheres. Such violence impedes gender equality

517 and the achievement of a range of development outcomes. VAWG is a complex and multifaceted problem that

518 cannot effectively be addressed from a single vantage point. The prevention of and response to such violence

519 require coordinated action across multiple sectors.

520

2521

Female genital mutilation (FGM)

2522 9.71. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to
2523 the female genital organs for non-medical reasons, hence interferes with the natural function of girls' and women's
2524 bodies. It has no health benefits and harms girls and women in many ways.

2525 9.72. The age at which girls undergo FGM varies enormously according to the community in which they live. The procedure
2526 may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the
2527 first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 to 8 years
2528 and therefore girls within that age bracket are at a higher risk.

2529 9.73. In 2003 FGM became a criminal offence for UK nationals or permanent UK residents to take their child abroad to
2530 have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.
2531 It is mandatory for teachers to report known cases of FGM to the police.

2532

Forced marriage

2533 9.74. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses cannot
2534 consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and
2535 emotional pressure.' In developing countries approx. 11% of girls are married before the age of 15. One in 3 victims
2536 of forced marriage in the UK are under 18 years old.

2537 9.75. It is important that all members of staff recognise the presenting symptoms, know how to respond if there are
2538 concerns and where to turn for advice.

2539 9.76. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151** and locally
2540 through the local police safeguarding team or children's social care.

2541 9.77. While all members of staff (education, care, clinical) have important responsibilities with regard to children, young
2542 people or adults who may be at risk of forced marriage, managers and leaders should not undertake roles in this
2543 regard that are most appropriately discharged by other children's services professionals such as police officers or
2544 social workers.

2545

Breast ironing

2546 9.78. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using
2547 hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's
2548 mother who will say she is trying to protect the girl from sexual harassment and rape, to prevent early pregnancy
2549 that would tarnish the family name, or to allow the girl to pursue education rather than be forced into early
2550 marriage. It is mostly practiced in parts of Cameroon, where boys and men may think that girls whose breasts have
2551 begun to grow are ready for sex. Some reports suggest that it has spread to the Cameroonian diaspora, for example
2552 to Britain. The most widely used implement for breast ironing is a wooden pestle normally used for pounding
2553 tubers.

2554 9.79. Any suspected cases of breast ironing MUST be reported immediately under this Child Protection and Safeguarding
2555 policy and the Individual offered medical help.

2556

Teenage relationship abuse

2557 9.80. Research has shown that teenagers don't readily understand what constitutes abusive behaviour such as controlling
2558 behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them what to wear, who
2559 they can/can't see or speak to and that this abuse is prevalent within teen relationships.

2560 9.81. Further research shows that teenagers don't understand what consent means within their relationships. They often
2561 hold the common misconception that rape can only be committed by a stranger down a dark alley and don't
2562 understand that it could happen within their own relationships. This can lead to these abusive behaviours feeling
2563 'normal' and therefore unchallenged as they are not recognised as being 'abusive'.

2564 9.82. Vulnerable Individuals may struggle to understand such concepts and the
565 potential consequences of their own, their peers or others behaviour towards them. Therefore significant effort
566 will be made to raise awareness of it and respond effectively to such situations.

567 9.83. In response to this Cambian Group will provide education and guidance to prevent teenagers from becoming victims
568 and perpetrators of abusive relationships - encouraging them to rethink their views of violence, abuse and
569 controlling behaviours, and understand what consent means within relationships.

570 Honour-based violence

571 9.84. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their
572 family or community by doing something that is not in keeping with the traditional beliefs of their culture. However,
573 abuse committed in the context of preserving "honour" often involves a wider network of family or community
574 pressure and can include multiple perpetrators. It is important to be

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

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

581 9.85. Girls and women are the most common victims of honour-based violence however it can also affect men
582 and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour'
583 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced
584 marriage, being held against their will or taken somewhere they don't want to go.

585 9.86. If staff believe that the Individual is at risk from honour-based violence the DSL will follow the usual
586 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is
587 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
588 teachers. It is important that if honour-based violence is known or suspected, communities and family
589 members must NOT be contacted prior to referral to the police or social care as this could increase the
590 risk to the individual.

591 Preventing extremism and radicalisation

592 9.87. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism including support
593 for terrorism ideology and extremist ideas. In accordance with our **026. Preventing Extremism and Radicalisation**
594 **policy** and **0.27 E-safety policy** we all need to be vigilant in ensuring the safety from extremist and terrorist material
595 when accessing the internet. We consider Essex County Local Authority Safeguarding Children's Board
596 arrangements to fulfil its Prevent duties.

597 9.88. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of
598 harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding
599 approach.

- 600 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of
601 law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also
602 includes calling for the death of members of the armed forces.
- 603 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist
604 ideologies associated with terrorist groups.
- 605 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious
606 damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be

- 2607 designed to influence the government or to intimidate the public and is made
2608 for the purpose of advancing a political, religious or ideological cause.
- 2609 9.89. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
2610 Background factors combined with specific influences such as family and friends may contribute to a
2611 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social
2612 media or the internet) and settings (such as within the home).
- 2613 9.90. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
2614 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to
2615 changes in children’s behaviour, which could indicate that they may be in need of help or protection.
- 2616 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2617 proportionately which may include making a Prevent referral.
- 2618 9.91. The school’s or college’s DSL (and any deputies) should be aware of local procedures for making a Prevent
2619 referral
- 2620 9.92. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act
2621 2015 (the CTSa 2015), in the exercise of their functions, to have “due regard to the need to prevent people
2622 from being drawn into terrorism”. This duty is known as **the Prevent duty**.
- 2623 9.93. [An online general awareness training module on Channel is available](#). The module is suitable for school
2624 staff and other front-line workers. It introduces the topics covered by this advice, including how to identify
2625 factors that can make people vulnerable to radicalisation, and case studies illustrating the types of
2626 intervention that may be appropriate, in addition to Channel.

Prevent Duty

- 2628 9.94. The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. DSLs and other
2629 senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and
2630 Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). DSLs
2631 and other senior leaders in colleges should familiar themselves with the [Prevent duty guidance: for further
2632 education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk
2633 assessment, working in partnership, staff training, and IT policies.
- 2634 9.95. Local authorities will be expected to ensure appropriate frontline staff, including those of it’s contractors, have a
2635 good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism and are aware
2636 of available programmes to deal with this issue.
- 2637 9.96. As the independent body responsible for standards and quality improvement for further education, the Education
2638 and Training Foundation will work with the sector to ensure that appropriate training is available. This will include
2639 and draw from training provided through the network of Prevent coordinators.

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

- 2641 9.97. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.
- 2642 9.98. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in
2643 power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for
2644 something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or
2645 facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female
2646 and can include children who have been moved (commonly referred to as trafficking) for the purpose of
2647 exploitation.

Child Criminal Exploitation (CCE)

- 2649 9.99. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money
2650 through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or
2651 manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can

2652 become trapped by this type of exploitation as perpetrators can threaten
653 victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying
654 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children
655 involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always
656 recognised by adults and professionals, (particularly older children), and they are not treated as victims despite
657 the harm they have experienced. They may still have been criminally exploited even if the activity appears to be
658 something they have agreed or consented to.

659 9.100. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys.
660 The indicators may not be the same, however professionals should be aware that girls are
661 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited
662 may be at higher risk of sexual exploitation.

663 **Child Sexual Exploitation (CSE)**

664 9.101. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for
665 example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside
666 clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing
667 children to look at sexual images or watch sexual activities, encouraging children to behave in sexually
668 inappropriate ways or grooming a child in preparation for abuse including via the internet.

669 9.102. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge
670 e.g. through others sharing videos or images of them on social media.

671 9.103. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds
672 who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they
673 are in a genuine romantic relationship

674 9.104. Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular
675 groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or
676 neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or
677 school, children involved in crime, children with parents/carers who have mental health problems, learning
678 difficulties/other issues, children who associate with other children involved in exploitation. However, it is
679 important to recognise that any child can be targeted.

680 9.105. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including
681 gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In
682 some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial
683 benefit or other advantage (such as increased status) of the perpetrator or facilitator.

684 9.106. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of 18 years,
685 including 16 and 17 year olds who can legally consent to have sex) or adults. It is critical to know that
686 children/young people may also be exploited by other children/young people, who themselves may be
687 experiencing exploitation – where this is the case, it is important that the child/young person perpetrator is also
688 recognised as a victim.

689 9.107. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex
690 organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be
691 accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual
692 and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More
693 information include definitions and indicators are included in - [KCSIE 2023](#)

694 [- Part One](#). Some of the following can be indicators of both child criminal and sexual exploitation where children:

- 695 • appear with unexplained gifts or new professions;
- 696 • associate with other young people involved in exploitation;
- 697 • suffer from changes in emotional well-being;

- 2698 • misuse drugs and alcohol;
- 2699 • go missing for periods of time or regularly or come home late; and
- 2700 • regularly miss school or education or do not take part in education.
- 2701
- 2702 9.108. Some additional specific indicators that may be present in CSE and children who:
- 2703 • Children who have older boyfriends or girlfriends; and
- 2704 • Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected
- 2705 sexual development or or become pregnant.
- 2706 9.109. Further information on signs of a child’s involvement in sexual exploitation is available in Home Office
- 2707 guidance: Child sexual exploitation: guide for practitioners.
- 2708 9.110. As an organisation we do recognise that the same level of exploitation may take place involving vulnerable
- 2709 young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18 years or
- 2710 over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act 2014).
- 2711 As we do provide services for vulnerable young people/adults at risk, therefore it is expected that the
- 2712 above statement will equally apply to those who are 18+ across England and Wales.
- 2713 9.111. Children under the age of criminal responsibility (under the age of 10), or young people who have
- 2714 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal
- 2715 activity provide opportunity for criminals to distance themselves from crime.
- 2716 **County Lines**
- 2717 9.112. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs
- 2718 using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across
- 2719 the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and
- 2720 sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and
- 2721 weapons to ensure compliance of victims. Children can be targeted and recruited. Exploitation is an integral part
- 2722 of the county lines, children may become victims through: coercion, intimidation, violence (including sexual) and
- 2723 weapons.
- 2724 9.113. Children can be targeted and recruited into county lines in a number of locations including schools, further and
- 2725 higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care
- 2726 homes. Children are often recruited to move drugs and money between locations and are known to be exposed to
- 2727 techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become
- 2728 trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and
- 2729 kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 2730 9.114. Children are also increasingly being targeted and recruited online using social media. Children can easily become
- 2731 trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked
- 2732 off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county
- 2733 lines network. These children and young people are at serious risk of criminalisation, sexual exploitation and
- 2734 exposure to violence. This is facilitated by a group who may not necessarily be affiliated to a gang, but who have
- 2735 developed networks across geographical boundaries to access and exploit existing drugs markets in these areas.
- 2736 9.115. The group, or individuals exploited by them, travel regularly between the urban hub and the rural marketplace, to
- 2737 replenish stock and deliver cash. This movement is not unique to county lines drug supply but is generally more
- 2738 frequent and in smaller deal amounts compared to most other drug supply methods.
- 2739 9.116. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in
- 2740 county lines. Some additional specific indicators that may be present where a child is criminally exploited through
- 2741 involvement in county lines are children who:

- 2742 • go missing and are subsequently found in areas away from their home;
- 743 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 744 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting
- 745 money for drugs;
- 746 • are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- 747 • are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’
- 748 or hotel room where there is drug activity;
- 749 • owe a ‘debt bond’ to their exploiters;
- 750 • have their bank accounts used to facilitate drug dealing.

751 9.117. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered

752 alongside consideration of availability of local services/third sector providers who offer support to victims of county

753 lines exploitation.

754 Cuckooing

755 9.118. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation of county

756 lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of

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

758 9.119. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as

759 a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

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

761 9.120. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

762 9.121. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally exploited

763 include:

- 764 ▪ Increase in missing episodes (Education and/or Care) – particular key as children/young people can be missing
- 765 for days and drug run in other counties
- 766 ▪ Having unexplained amounts of money, new high cost items and multiple mobile phones
- 767 ▪ Increased social media and phone/text use, almost always secretly
- 768 ▪ Older males in particular seen to be hanging around and driving
- 769 ▪ Having injuries that are unexplained and unwilling to be looked at
- 770 ▪ Increase in aggression, violence and fighting
- 771 ▪ Carrying weapons – knives, baseball bats, hammers, acid
- 772 ▪ Travel receipts that are unexplained
- 773 ▪ Significant missing cases from education and disengaging from previous positive peer groups
- 774 ▪ Parents/carers concerns and significant changes in behaviour that affect emotional wellbeing

775 9.122. We will treat any child/young person who may be criminally exploited as a victim in the first instance and refer to

776 the Local Safeguarding Authority in the first instance. If a referral to the police is also required as crimes have

777 been committed on the school premises, these will also be made.

2778

Knife crime

- 2779 9.123. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes references to
 2780 both; to the use of knives against children either to threaten or to wound them and to instances when children
 2781 may have been carrying or using knives for a range of purposes.
- 2782 9.124. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife-
 2783 carrying. However, there are many different criminal offences relating to knives. For example:
- 2784 • it is an offence to threaten or cause harm to a person with a bladed weapon
 - 2785 • some bladed weapons are prohibited from being sold or purchased, including to anyone under the
 2786 age of 18
 - 2787 • offences such as robbery or assault can be aggravated if a knife is involved
 - 2788 • it is also an offence to carry a knife in a public place without good reason.
 - 2789 • It is clear that knife crime is an increasing safeguarding risk to children and young people, both at
 2790 school and in their local communities. While Ofsted have not sought to answer the question of the
 2791 causes of knife crime, leaders told Ofsted that, in their experience, children are in three categories
 2792 of risk of knife-carrying.
- 2793 9.125. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
 2794 criminal exploitation.
- 2795 9.126. Underneath this lies a group of children who have witnessed other children carrying knives, have been
 2796 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or
 2797 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on social
 2798 media.
- 2799 9.127. Then there are children who carry knives to school as an isolated incident. For example, they may carry a
 2800 penknife that a grandparent has gifted them
- 2801 9.128. It is important to remember that knife crime does not exist in a vacuum and children who are victims or
 2802 perpetrators may also be experiencing multiple vulnerabilities.
- 2803 9.129. Some children and young people can be more at risk of being drawn into criminality, multiple studies
 2804 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
 2805 both understand and address individual risk factors as well as address the social challenges that underpin
 2806 criminal exploitation and serious violence in our communities, from poor mental health, addiction,
 2807 poverty, unemployment and poor-quality housing.
- 2808 **Missing young people and the link between missing and county lines**
- 2809 9.130. Every precaution is taken through the use of risk assessments and thorough planning and supervision to
 2810 ensure that children, young people and young adults are safe both at school, college, home, and on
 2811 outings. If a child, young person or young adult goes missing from our Location it is considered a potential
 2812 indicator of abuse or neglect.
- 2813 9.131. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of someone
 2814 going missing. All homes/schools/colleges must inform the LA of any student who fails to attend school
 2815 regularly or has been absent without the school's permission for a continuous period of 10 days or more
 2816 or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs such as
 2817 travelling to conflict zones, FGM and forced marriage.
- 2818 9.132. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
 2819 towards going missing and becoming involved in criminal activities. Some individuals may be pulled

2820 towards exploitation through the promise of money, gifts, affection and status.
821 However, they may be then be forced to work for these people as they are coerced into believing that
822 they are indebted to them.

823 Domestic abuse

824 9.133. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory
825 definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right,
826 if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the
827 previous cross-government definition, ensures that different types of relationships are captured, including ex-
828 partners and family members. The definition captures a range of different abusive behaviours, including physical,
829 emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the
830 behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be
831 “personally connected” (as defined in section 2 of the 2021 Act).

832 9.134. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse
833 and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of
834 gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or
835 outside of the home. The government will issue statutory guidance to provide further information for those
836 working with domestic abuse victims and perpetrators, including the impact on children.

837 9.135. All children can witness and be adversely affected by domestic abuse in the context of their home life where
838 domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious,
839 long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the
840 abuse or may have had to leave the family home as a result.

841 9.136. Young people can also experience domestic abuse within their own intimate relationships. This form of peer on
842 peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people,
843 this may not be recognised in law under the statutory definition of ‘domestic abuse’

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

848 9.137. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to
849 provide emotional and practical help to children. The system ensures that when police are called to an incident of
850 domestic abuse, where there are children in the household who have experienced the domestic incident, the police
851 will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day.
852 This ensures that the school has up to date relevant information about the child’s circumstances and can enable
853 immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace
854 statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to
855 children’s social care if they are concerned about a child’s welfare. More information about the scheme and how
856 schools can become involved is available on the Operation Encompass website.

857 9.138. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24
858 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those
859 who are worried about friends and loved ones. It also has a form through which a safe time from the team for a
860 call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they
861 can be helped is available at:

- 862 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 863 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 864 • [SafLives: young people and domestic abuse.](#)

2865 • [Domestic abuse: specialist sources of support - GOV.UK](https://www.gov.uk) (www.gov.uk)
2866 (includes information for adult victims, young people facing abuse in their own relationships and
2867 parents experiencing child to parent violence/abuse)

2868 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic abuse on
2869 children)

2870 **Serious Violent Crime**

2871 9.139. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious
2872 violent crime. These may include:

- 2873 • increased absence from school with a significant decline in performance,
- 2874 • a change in friendships or relationships with older individuals or group,
- 2875 • signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries,
- 2876 • unexplained gifts or new possessions could also indicate that children have been approached by, or are involved
2877 with individuals associated with criminal networks or gangs.

2878 9.140. All staff should be aware of the associated risks and understand the measures in place to measure these. Advice
2879 for schools and colleges is provided in the Home Office’s Preventing youth violence and gang involvement and its
2880 [criminal exploitation of children and vulnerable adults: County Lines guidance - September 2018](#).

2881 **Mental Health**

2882 9.141. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing of young
2883 people. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has
2884 suffered or is at risk of suffering abuse, neglect or exploitation.

2885 9.142. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying possible
2886 mental health problems, including routes to escalate and clear referral and accountability systems.

2887 9.143. The Department is providing funding to support costs of a significant training program for senior mental health
2888 leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be available to all
2889 state-funded schools and colleges by 2025, to help introduce or develop their whole school approach to mental
2890 health.

2891 9.144. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff
2892 however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they
2893 may be experiencing a mental health problem or be at risk of developing one. If staff suspect this might be the case
2894 they should report their concerns to a senior leader within the school and if possible bring their concerns to a
2895 member of the clinical team.

2896 9.145. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences,
2897 this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff receive
2898 appropriate education and training so that they are aware of how these children’s experiences, can impact on their
2899 mental health, behaviour and education.

2900 9.146. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be
2901 taken. Staff should follow their child protection policy and speak immediately to the DSL or a deputy.

2902 9.147. Schools and colleges can access a range of advice to help them identify children in need of extra mental health
2903 support, this includes working with external agencies. More information can be found in the [mental health and](#)
2904 [behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health
2905 England has produced a range of resources to support secondary school teachers to promote positive health,
2906 wellbeing and resilience among children.

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2907 9.148. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their pupils.

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

Human trafficking

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

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

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

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

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

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

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

- 2948 - Physical symptoms (bruising indicating either physical or sexual assault)
- 2949 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 2950 - Reports from reliable sources suggesting the likelihood of involvement in
- 2951 - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- 2952 - Evidence of drug, alcohol or substance misuse
- 2953 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from
- 2954 - older people
- 2955 - Relationship with a significantly older partner
- 2956 - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible
- 2957 - explanation of the source of necessary funding
- 2958 - Persistently missing, staying out overnight or returning late with no plausible explanation
- 2959 - Returning after having been missing, looking well cared for despite having not been at home
- 2960 - Having keys to premises other than those known about
- 2961 - Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder,
- 2962 - promiscuity
- 2963 - Truancy / disengagement with education
- 2964 - Entering or leaving vehicles driven by unknown adults
- 2965 - Going missing and being found in areas where the child/young person/young adult has no known links; and/or
- 2966 - Possible inappropriate use of the internet and forming on-line relationships, particularly with adults/other
- 2967 - adults.

2968 9.155. These behaviours themselves do not indicate that an Individual is being trafficked, but should be considered as
2969 indicators that this may be the case.

2970 **Modern slavery and the National Referral Mechanism**

2971 9.156. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
2972 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced
2973 criminality and the removal of organs.

2974 9.157. When considering modern slavery, there is a perception that this is taking place overseas. The government
2975 estimates that tens of thousands of slaves are in the UK today.

2976 9.158. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or
2977 other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of
2978 slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

2979 9.159. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be reported to the
2980 DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

2981 9.160. Further information on the signs that someone may be a victim of modern slavery, the support available to victims
2982 and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
2983 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

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

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

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

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

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

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

Initiation/Hazing

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

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

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

Safeguarding issues relating to Individual children and young people needs

Homelessness

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

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

9.170. In most cases school and college colleagues will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, or other reasons. This will require a different level of intervention and support. Children's

3029 3028 services will be the lead agency for these young people and the DSL (or a
3030 deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the
3031 Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision
3032 of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [Homelessness
Reduction Act: policy factsheets](#).

3033 9.171. Guidance on how local authorities should exercise their homelessness functions in accordance with the
3034 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local authorities](#).

3035 9.172. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young people and
3036 the DSL should ensure appropriate referrals are made based on the Individual's circumstances.

3037 9.173. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be progressed as
3038 appropriate, this does not, and should not, replace a referral into the Local Safeguarding Authority where an
3039 Individual has been harmed or is at risk of harm.

3040 **Private Fostering**

3041 9.174. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for
3042 by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or
3043 more.

3044 9.175. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or
3045 aunt.

3046 9.176. The Law requires that the carers and parents must notify the Children's Services Department of any private
3047 fostering arrangement.

3048 9.177. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is being
3049 privately fostered they will inform the Children's Services Department and inform both the parents and carers that
3050 they have done so.

3051 **Child and the Court System**

3052 9.178. As an organisation we recognise that children/young people are sometimes required to give evidence in criminal
3053 courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a
3054 stressful experience and therefore services across the organisation will aim to support children through this
3055 process.

3056 9.179. Along with information, advice and guidance, services will use age-appropriate materials published by HM Courts
3057 and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means to be a witness, how
3058 to give evidence and the special measures which are in place to assist such as using a live link/aids to communicate
3059 and video links.

3060 9.180. We recognise that making child arrangements via the family courts following separation can be stressful and
3061 entrenched conflict in families. This can be very stressful for children. Services will support children/young people
3062 going through this process.

3063 9.181. Alongside information, advice and guidance services will use online materials published by The Ministry of Justice
3064 (2018) which offers children/young people information & advice on the dispute resolution service - [Get help with
child arrangements](#). These materials will also be offered to parents and carers if appropriate.

3066 9.182. Ensure that children/young people are sufficiently supported where a parent has been sent to prison, adequate
3067 support includes protection from: stigma, isolation and poor mental health.

3068 **Fabricated or induced illnesses (FII)**

3069 9.183. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's
3070 biological mother, exaggerates or deliberately causes symptoms of illness in the child.

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3071 9.184. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

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

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

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- persuades healthcare professionals that their child is ill when they're perfectly healthy,

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- exaggerates or lies about their child's symptoms,

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- manipulates test results to suggest the presence of illness – for example, by putting glucose in urine samples to suggest the child has diabetes,

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- deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary medication or other substances.

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