Policy No: 25

Policy and Procedure on

Child Protection and Safeguarding

Northampton Cambian School

Policy Author	Tom Burford, Director for Improving Children's Services
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1. Monitoring and Review:

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

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

Signed:

Signature

Rebecca Hill

Anne Marie Carrie
Proprietor and Cambian Group Safeguarding Lead
Date: July 2017

2. Definitions and Terminology

Terminology

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

'Establishment' or 'Location	this is a generic term which means the Children's Home/school/college.
Individual	means any child or young person under the age of 18, young adult between the ages of 18 and 25 including adult at risk. At Northampton Cambian School we have a maximum of 24 students, boys and girls. Students can come from local areas around Northamptonshire, including Corby, Kettering, Bedford. Some students are looked after students. Students at Northampton Cambian School range between the ages of 11-18.
Service Head / Head of Service	This is the senior person with overall responsibility for the At Northampton Cambian School this is The Head Teacher Rebecca Hill
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 child/family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	is the online in-house information system which holds data for each site on quality measures.
LSCB, LADO, SAB	Local Safeguarding Children Board Local Authority Designated Officer Safeguarding Adults Board

Supporting Information and references

2.2. All Cambian documentation referred to in this policy document is listed in Section 8 – Standard Forms Relevant Documents, Letters & References

The Definition of Children, Young People and Adults at Risk.

2.3. Many of our schools and colleges have children, young people and young adults/adults at risk in one setting:

- **Children and Young people are under 18**. Working together to Safeguard Children (2018) and Keeping Children Safe in Education (2018) only applies to children and young people until they reach the age of 18. They are covered by the Local Safeguarding Children Boards (LSCB) and their current procedures.
- **Young Adults who are over 18**. Government guidance can be gained from the Care Act 2014, since April 2015, which superseded a previous government document called, 'no secrets'. The Social Services and Wellbeing Act 2014 has come into force in Wales on 1 April 2016. Over 18 year olds are covered by the

Safeguarding Adult Boards (SABs) in England and Protection of Vulnerable Adults (POVA) in Wales. Recent government documentation has replaced the word vulnerable and use the term '**adults at risk**'. An adult at risk of harm or abuse is any person who: has needs for care and support and; is experiencing or at risk of abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect'.

Where a safeguarding issue is raised for a young adult/adult at risk, the matter should be dealt with by the adult safeguarding team. Where someone is over 18 but still receiving children's services, the matter should be dealt with by the adult safeguarding team.

Staff working with Individuals of the age of 18 an over are aware of the safeguarding referral process to their local SAB/MASH/POVA Teams depending on local arrangements and they understand the provision's statutory safeguarding duties, under the Care Act 2014.

Definition of Safeguarding

2.4. **Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of their health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective and nurturing care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

2.5. **Safeguarding Adults -** the process of safeguarding refers to protecting a person's right to live in safety, free from abuse and neglect. '**Adults at risk**', is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.

Definition of Abuse

2.6. **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. Abuse can be intentional or unintentional; it may be a single act or repeated acts. 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.

Types of Abuse

2.7. **Children and Young People**

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse**: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities 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 looking at, or in the production of, sexual images, watching 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.

- **Child Sexual Exploitation** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. 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.

2.8. Adults

- **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding or withholding food, unauthorized restraint, restricting movement.
- **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour' - based violence, female genital mutilation and forced marriage. Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include: acts of assault, threats, humiliation and intimidation, harming, punishing, or frightening the person, isolating the person from sources of support, exploitation of resources or money, preventing the person from escaping abuse, regulating everyday behaviour.
- **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to, inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced use of pornography or witnessing of sexual acts, Indecent exposure
- **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property,

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inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, appointeeship or other legal authority.

- **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that realistically they never will be able to.
- **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010). Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic, denying access to communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic, substandard service provision relating to a protected characteristic.
- **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or assistance with eating, not offering choice or promoting independence, misuse of medication, failure to provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence or communication, failure to respond to complaints.
- **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure to administer medication as prescribed, refusal of access to visitors, not taking account of individuals' cultural, religious or ethnic needs, not taking account of educational, social and recreational needs, ignoring or isolating the person, preventing the person from making their own decisions, preventing access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
- **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances, where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise self-neglect as a safeguarding concern. However, interventions on self-neglect are usually more appropriate under the parts of the Care Act dealing with assessment, planning, information and advice, and prevention.

It is vital to establish whether the person has capacity to make decisions about their own wellbeing, and whether or not they are able or willing to care for themselves. An adult who is able to make choices may make decisions that others think of as self-neglect. Risk and capacity assessments are likely to be useful. The legislation makes clear that adult safeguarding responses should be guided by the adult themselves, to achieve the outcomes that they want to achieve.

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

1. Empowerment - presumption of person led decisions and informed consent
2. Prevention - it is better to take action before harm occurs
3. Proportionality - proportionate and least intrusive response appropriate to the risk presented
4. Protection - support and representation for those in greatest need
5. Partnerships - local solutions through services working with their communities
6. Accountability - accountability and transparency in delivering safeguarding

3. Roles and Responsibilities:

Designated Safeguarding Lead (DSL)

Name:
Contact:

3.1. Our Designated Safeguarding Lead (DSL) is Rebecca Hill (Lead), Rob Bilbe (Pastoral manager), and Leanne Dodds (SENCO Lead Teacher) who is a senior member of our leadership team.

3.2. The role of the Designated Safeguarding Lead is to:

- Take lead responsibility for managing safeguarding issues and cases.
- Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Board; child or adult.
- Act as a source of advice, support and expertise within the location when deciding to make a referral by liaising with relevant agencies.
- Identify safeguarding training needs and organise training.
- Participate in local safeguarding boards when required.
- Evaluate and contribute to high standards of safeguarding practice at the location.
- Work to ensure that wellbeing of children and young people placed in our Northampton Cambian School is in constant focus and that they are guarded from harm or abuse.

Designated Deputy

3.3. We have made arrangements for covering the role of the Designated Safeguarding Lead when Rebecca Hill is unavailable. Our Designated Deputies are Rob Bilbe and Leanne Dodds.

Name:	Name:	Name:
Contact:	Contact:	Contact:

For all Key Contacts – see Appendix II

4. Purpose

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4.1. This policy provides staff and volunteers with the guidance they need in order to keep all Individuals safe and secure in any of our settings. Cambian is committed to safeguarding and promoting the welfare of all in our care and expects all staff and volunteers to share this commitment with our aim of helping them to fulfil their potential.

4.2. This policy complies with the statutory and best practice guidance as set out in the Staff Safeguarding Information Poster and is set out in alignment with legislation outlined in Appendix I of this policy. It also complies with Northampton County Council's model safeguarding policy and is in accordance with locally agreed procedures. Relevant printed copies of the Local Safeguarding Children's Boards (LSCB) and Safeguarding Adults Board (SAB) procedures are available in every setting.

4.3. All policies and procedure for child protection (safeguarding) and Safeguarding young Adults must be undertaken in accordance with the requirements of the local authority in which the establishment is situated. In the event that the local authority safeguarding board (LSCB) has been deemed 'Requiring Improvement' or 'Inadequate' by Ofsted or CQC (Child Safeguarding Inspection Programme) the establishment will seek further advice from Cambian and its advisers.

4.4. This policy, and supporting information in various accessible forms, is made available to all children, young people, staff and parents associated with Cambian Northampton Cambian School to ensure that everyone is clear on how we protect and safeguard children and young people. All staff are expected to be familiar with the Cambian's Whistleblowing Policy and Staff Code of Conduct. In addition, the NSPCC whistle-blowing helpline number is 0800 028 0285 and the Cambian Whistleblowing service, EXPOLINK can be called on **0800 111 4298.**

5. Policy

5.1. A comprehensive list of all supporting documentation and related policies and guidance referred to in this document can be found in Section 8.

Safeguarding and Promoting the Welfare of Children, Young People and Young Adults/Adults at risk mean:

- Protecting them from any form of maltreatment.
- Preventing impairment of their health or development.
- Taking action to enable them to achieve best outcomes.
- Ensuring that all children and young people grow up in circumstances consistent with the provision of safe and effective care and that all adults live safely free from any form of abuse.

5.2. We all have a duty to act upon any suspicion, concern or disclosure that may suggest a child/young person or a young adult is at risk of significant harm or in need of help. As provider of specialist education and care services it is imperative that all staff are aware that children, young people and young adults/adults at risk with Special Educational Needs (SEN) and disabilities are more likely to be abused or neglected. We will reflect on additional safeguarding challenges and take following into consideration:

- Awareness that behaviour, mood and injury may relate to possible abuse and not just their SEN or a particular disability
- Higher risk of peer group isolation
- Children and young people with SEN and disabilities and adults at risk can be disproportionally impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.
- Children and young people experiencing distress or abuse outside the provision may seek to 'tell' in school, college or a home they live in e.g. day students or 38 weeks residential placements - often because this is the place where they feel most safe, secure and listened to.

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5.3. Safeguarding is everyone's responsibility. We all have a responsibility to understand and implement this policy and related procedures at all times.

6. Procedure

6.1. All staff will be given a personal copy of the booklet entitled, 'Child Protection & Safeguarding Handbook for Staff'). The contents and detail of this document are covered in induction and training programmes and all staff are required to follow the procedures to the letter at all times. DSL training and renewal training will be updated every two years. ALL Cambian staff will not be allowed to work with children unless they have completed basic awareness training in child protection (safeguarding). The Northampton Cambian School must check that supply/agency staff have completed basic awareness training before being allowed into contact with children. Contractors and others on site who might have unsupervised access to children must also complete basic awareness training before being allowed to start work.

6.2. All staff must update their basic awareness training at least annually by completing the 'Safeguarding Adults and Children – E-Learning' module on Achieve.

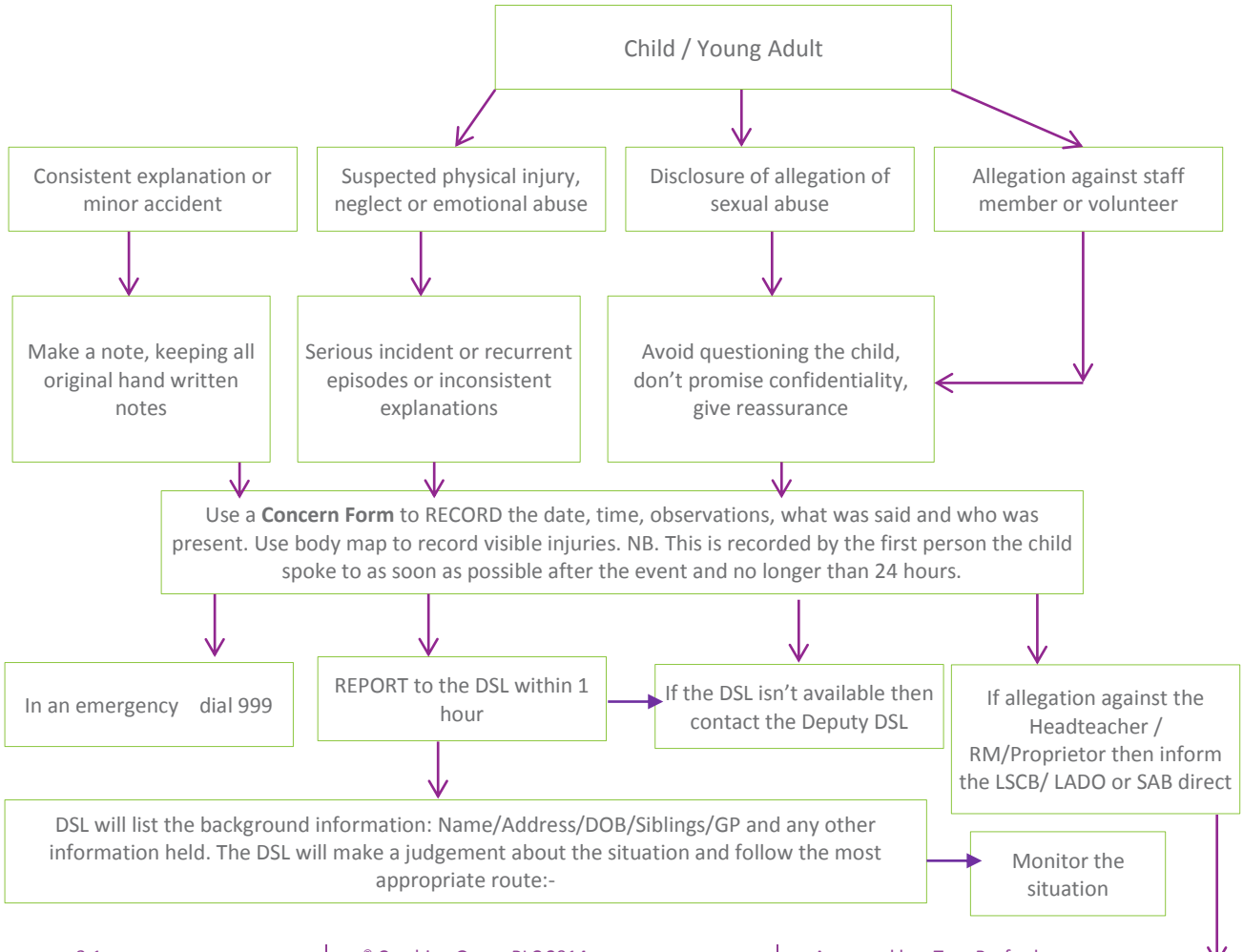
6.3. In recording and managing concerns and allegations regarding the abuse of individuals all staff must use the forms as set out in this policy.

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

Flow Chart Procedure

The flowchart below sets out the procedure which should be followed:

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



STAFF DSL

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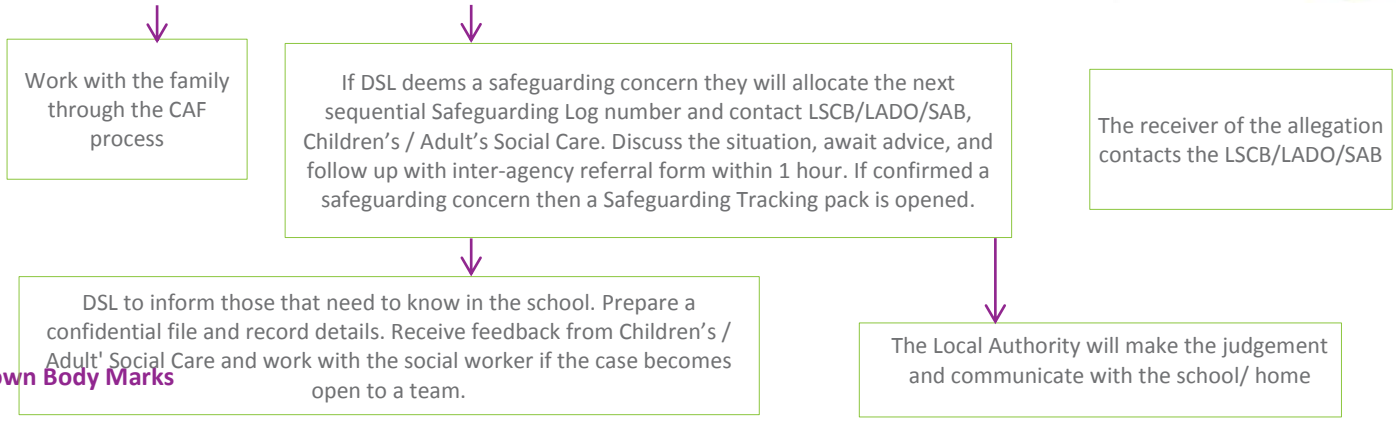

Unknown Body Marks

6.5. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises, swellings, and scratches which by and large will be as a result of daily activities or for some Individuals as a result of self-injurious behaviour. However, all such marks must be recorded appropriately on body maps and using Incident forms and / or accident forms. Parents/carers and social workers should always be kept informed.

6.6. All unaccounted for marks or physical changes on the body must be recorded on a body map and a Concern Form completed and passed to the DSL along with copies of the last 3 days of Daily Diary notes and Activity Records. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no reason can be found the DSL must allocate a Safeguarding Reference number and contact the LSCB/ LADO for further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern. The flowchart provided in Guidance for Investigating Unknown Body marks indicates the correct course of action for dealing with unknown body marks.

Serious Incident Reporting

6.7. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported to the relevant Care Quality Governance Committee members as outlined in the Serious Incidents escalation procedures.

Immediate Actions

6.8. Where a child, young person or young adult discloses abuse or neglect:

Listen to what they have to say and take them seriously. Reassure them but do not promise to keep it a secret. Children, young people and young adults will be informed that if they want to preserve confidentiality that there are other agencies they can turn to e.g. **Child Line 0800 1111**. If the child/young person/young adult needs medical attention, seek assistance. If urgent medical attention is required see paragraph 6.15.

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the young person and any actions taken (which may be used in any subsequent court proceedings) within 24 hours of the disclosure. Ensure all details are recorded using a Concern Form.

Do not

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

6.9. The next step is to notify the DSL and pass the Concern Form to them within one hour or as soon as is possible. If the DSL is unavailable, then the Deputy DSL should be informed. All staff know that they can contact the Local Authority direct should that be necessary. Any allegation against a staff member must also be reported to the Head of Service.

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However, if the allegation is about the Headteacher/Principal/Home Manager/DSL then the relevant Operations Director must be informed. Guidance is available to staff who have an allegation made against them.

*Note: where contact is made with the Local Authority in which Cambian Northampton Cambian School is geographically located, contact will also be made with the individual's own Local Authority and also their social worker.

6.10. The DSL will determine whether the matter is a child protection/safeguarding matter or a more general concern and immediately enter the concern details on the Central Log of Concerns and Safeguarding and insert the concern reference number on the Concern Form. If it is deemed to be a child protection/safeguarding matter the DSL will then also additionally allocate the next sequential Safeguarding Reference number on the Central Log of Concerns, write this number on the Concern form and immediately (or at least within one hour) make a referral to the Local Authority Designated Officer (LADO) Northampton County council to discuss the allegation and agree a course of action.

6.11. If the LSCB/LADO/SAB confirms that they do not consider the matter to be a safeguarding concern then the date and time of the contact is recorded on the Concern Form and on the Central Log of concerns and safeguarding is marked as a Safeguarding Level 1 – Review Practice/No Further Investigation. It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken. This diligent approach will ensure a clear historic record of contact with the LSCB/LADO/SAB for any matter which is deemed by the DSL to be of concern and has been raised with the LSCB/LADO/SAB.

6.12. If the LSCB/LADO/SAB confirms that the matter is a safeguarding concern and that it requires investigation either at local or external level then a Safeguarding Tracking pack must be opened with the next sequential Safeguarding Reference included on the form and details as such entered on the central log. The DSL will send a copy of page 1 of the Safeguarding Tracking Pack to the relevant Operations Director.

6.13. In the case of serious harm, and/or the child/young person or young adult is in immediate danger the local Police should be informed immediately as well and they can take immediate protective action as necessary.

6.14. If the matter is a more general concern then ensure that the 'Action Taken' log is completed on the concern form and the form is filed within the Safeguarding file. Either way the form must be signed by the DSL. The relevant concern form should be referenced in the Individual's Index of Concerns form in the individual's concern/safeguarding file and the site's Central Log of Concerns.

6.15. All information relating to the Safeguarding concern is recorded on the Tracking Pack and the Safeguarding Concern will remain open until the LSCB/LADO/SAB have confirmed in writing that the concern is closed and an Operations Director or more senior representative of Cambian Group has signed the Safeguarding tracking pack to confirm that the investigation is completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off have been completed.**

6.16. If it is believed that the child/young person or young adult is in imminent danger urgent advice should be sought from the Local Authority and/or the police. The individual can be kept in their care home or on the school/college site fully supported (e.g. if they are a day student) if advised to do so by these agencies. The parent/carers should be informed and a decision should be made with the Local Authority and the Police about who should do what.

6.17. If the DSL feels unsure about what the child/young person or young adult has said or what has been said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse referral but may help to clarify the situation but they must record all details of any conversation and advice received on a concern form. He/she can then move to a formal referral or actively monitor the situation.

6.18. The LSCB/LADO will oversee any subsequent investigation of any suspicion or allegation of abuse directed against anyone working within the establishment. The establishment will not investigate allegations without first taking instruction from the LSCB/LADO. If as the result of an investigation there has been a substantiated allegation against a member of staff, we will work with the LSCB/LADO to determine whether there are any improvements to be made to our safeguarding policy, procedures and practice to prevent similar events in the future. We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police. Records are kept of all conversations as part of the investigation process and made available as required.

6.19. If a member of staff feels their concerns are not being taken seriously then they are to inform a more senior manager, a Director of the Company or contact Ofsted/CQC/the local safeguarding boards, the police or the **Whistleblowing Hotline – on 0800 1114298.**

6.20. The priority, at all stages throughout this process, is the interests and safety of the Individual. We will try to discuss any concerns about their welfare with their family / carers and where possible seek their agreement to making a referral to the Local Authority. However, where there is a conflict of interests between the child/young person/young adult and parent/guardian, the interests of the child/young person/young adult must take priority and Cambian Insert name of school/college/home reserves the right to contact child/young person/young adult's local authority, Social Care or the Police, without notifying parents/carers if this is in the their best interests.

6.21. If urgent medical attention is needed and there is a suspicion of abuse the DSL should take the Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority and seeking advice about what action the Local Authority and/or the Police will take and how the parents/carers will be informed, remembering that every reasonable effort should be made to inform the parents/carers as soon as possible if a child/young person requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the Local Authority and the Police can liaise with the hospital, unless the needs of the young person are such that medical attention is the priority. There must at all times be a responsible adult with the individual whether from the child/young person/young adult's care home/school/college, the Local Authority or the Police, if the parents/carers are not included.

6.22. We will provide an advocate to each Individual where appropriate, if they are unable to speak for themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA. As the Care Act promotes, 'no decision about me without me'. (See Mental Capacity and Consent for further guidance on IMCA)

6.23. Consent is not always needed to share personal information. Practitioners do not necessarily need consent to share personal information. Wherever possible, they should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. Practitioners should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.

Allegation of abuse by one or more young person on another young person

6.24. All young people involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for dealing with such abuse, where there is 'reasonable cause to suspect that a young person is suffering or likely to suffer significant harm will be followed. We will refer young person-on-young person abuse to an external safeguarding agency where there is a risk of significant harm. The DSL will report to the local Authority as above.

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

6.25. If we were given information that suggested that a member of staff was abusing someone who does not reside at or attends our Location the DSL would immediately report to the Local Authority. The Head of Service would be kept informed. We would then formally advise the employee of the allegation, making it clear that we would not play any part in the investigatory process. The employee would be advised of the possibility of facing suspension, re-assignment to other duties etc. in exactly the same way as if the allegation had involved a child/young person/young adult at our home/school/college. If the allegation is subsequently proved to be unfounded, he or she would be given full support in resuming their career.

Allegations against the Head of Service

6.26. Those should be reported immediately to the relevant Operations Director who will refer the matter to LADO/LSCB/SAB.

Allegations against the Proprietor

6.27. Those should be referred directly to the LADO/ LSCB/SAB

6.28. Staff should refer to the guidance provided for what to do in the event an allegation is made against them.

6.29. Staff on school sites, and parents are reminded that law prohibits publication of material that may lead to the identification of a teacher who is the subject of an allegation. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations against Staff

6.30. When an allegation is made against a member of staff, set procedures must be followed. Please see the flow chart in Section 6.

6.31. We must act on every allegation. However, staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

6.32. Staff should refer to the guidance provided for what to do in the event an allegation is made against them.

6.33. Staff on school sites, and parents are reminded that law prohibits publication of material that may lead to the identification of a teacher who is the subject of an allegation. Publication includes verbal conversations or writing, including content placed on social media sites.

Death of someone in our care

6.34. In the event of the death of a child, young person or young adult in one of our homes/schools/colleges we must notify the following within 24 hours:

- Operations Director/Regional Manager following the Serious Incidents reporting procedures will then brief the Chair of the Quality and Safeguarding Committee, Cambian's Chief Operating Officer Children's Services and Chief Executive.
- Next of kin/parents/carer of the deceased.
- Where the death of an individual occurs in an education location the assistance of the local police and social services department should be sought in informing the parents/guardians.
- The appropriate regulatory body: e.g. Ofsted, CQC, CSSIW
- Ministry of justice if applicable.
- The placing authority/authorities.
- The local authority responsible for Social Services and Education (where the death takes place in a registered school) within whose area the education location is situated.
- The District Health Authority within whose area the education location is situated.
- The Department for Children, Schools and Families, (where the death takes place in a registered school).
- The Health and Safety Executive.

Visitors to the home/school/college

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

High Risk Emerging Issues

Preventing Extremism and Radicalisation

6.36. All staff are fully aware of their duty in assessing the risk of our children, young people and adults being drawn into terrorism including support for terrorism ideology fundamental to which are extremist ideas. In accordance with our Preventing Extremism and Radicalisation policy and E-safety policy we need to be vigilant in ensuring the safety from extremist and terrorist material when accessing the internet. We take into account Insert Local Authority Safeguarding Children's Board arrangements to fulfil its Prevent duties. Cambian supports our children/young people and young adults in making positive choices about their lives and endorses the Channel early intervention scheme for those who

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could be at risk of radicalisation. We use Channel for co-ordinated advice and guidance as appropriate depending upon individual needs.

Gender Based Violence / Violence against women and girls

6.37. The government have a strategy looking at specific issues that women and girls face. Within the context of this Child Protection and safeguarding policy the following sections are how Cambian Group will respond to violence against girls. Female genital mutilation, forced marriage, honour based violence and teenage relationship abuse all fall under it.
https://www.gov.uk/government/policies/violence-against-women-and-girls

Female Genital Mutilation (FGM)

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

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

6.40. FGM is illegal in the UK.

6.41. On the 31 October 2015, it became mandatory for teachers to report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and the Head of Service will be informed and that the member of teaching staff has called the police to report suspicion that FGM has happened.

6.42. At no time will staff examine a child or young person to confirm this

6.43. If staff have a concern regarding FGM then normal local safeguarding procedures will be activated. In addition mandatory reporting to the police will occur in line with FGM Act 2003 as inserted by section 74 of the Serious Crime Act, 2015 Peer on Peer abuse

6.44. We will minimise the risk of allegations against other pupils by:-

- Providing a developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

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

6.46. All staff will be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.

Forced Marriage

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

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

6.49. Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care.

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

Honour-based violence

6.51. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against children, young people and young adults who:

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

6.52. Girls and women are the most common victims of honour based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

6.53. If staff believe that a child, young person or adult is at risk from honour based violence the DSL will follow the usual safeguarding referral process, however, if it is clear that a crime has been committed or the child, young person or adult is at immediate risk the police will be contacted in the first place. It is important that if honour based violence is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

County Lines and Cuckooing

6.54. Vulnerable children and young people/adults are being exploited and used by organised criminal networks to transport and sell class A drugs. These children and young people are at serious risk of criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not necessarily be affiliated as a gang, but who have developed networks across geographical boundaries to access and exploit existing drugs markets in these areas.

6.55. The exploitation of young and vulnerable persons is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace **(commonly referred to as cuckooing).**

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

Missing young people and the link between missing and county lines

6.57. Every precaution is taken through the use of risk assessments and thorough planning and supervision to ensure that children, young people and young adults are safe both at school, college, home and on outings. If a child, young person or young adult goes missing from our Location it is considered a potential indicator of abuse or neglect. Our staff members should follow our Missing from Care and Education policy and procedures in the event of someone going missing. Accordingly they are expected to act to identify any risk of abuse and neglect, including sexual abuse or exploitation. In addition all homes/schools/colleges must inform the LA of any student who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 days or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs such as travelling to conflict zones, FGM and forced marriage.

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

Teenage Relationship Abuse

6.59. Research has shown that teenagers didn't understand what constituted abusive behaviours such as controlling behaviours, which could escalate to physical abuse, e.g. checking someone's phone, telling them what to wear, who they can/can't see or speak to and that this abuse was prevalent within teen relationships. Further research showed that teenagers didn't understand what consent meant within their relationships. They often held the common misconception that rape could only be committed by a stranger down a dark alley and didn't understand that it could happen within their own relationships. This led to these abusive behaviours feeling 'normal' and therefore left unchallenged as they were not recognised as being abusive.

6.60. Vulnerable Individuals may struggle to understand such concept and potential consequences of their own, their peers or others behaviour towards them, therefore maximum effort will be taken to raise awareness of it and effectively respond to such situations.

6.61. In response to this Cambian Group will provide education to prevent teenagers from becoming victims and perpetrators of abusive relationships by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within the relationship.

Bullying

6.62. Our policy on anti- bullying is set out in a separate policy and 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 setting will take seriously any bullying concerns and both investigate and take action to protect pupils where appropriate.

Peer on Peer abuse and sexual violence and harassment

6.63. All staff will be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), resist or religious bullying, gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.

6.64. Research suggests that girls and young women are more at risk of abusive behaviours perpetrated by their peers; however it can also affect boys and young men, those with learning difficulties or disabilities, LGBTQ Children, young people, adults and those who are from different communities.

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

Examples:

- **'Cyberbullying' -** sending inappropriate or hurtful text messages, emails or instant messages, posting malicious material online (e.g. on social networking websites) or sending or posting offensive or degrading images and videos;
- **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status;
- **Sexual, Sexist and Transphobic Bullying -** any behaviour, whether physical or non-physical, where sexuality is used as a weapon by boys or girls;
- **Homophobic Bullying -** targets someone because of their sexual orientation (or perceived sexual orientation);
- **Disablist Bullying -** targets a young person solely based on their disability, this can include manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a certain aspect of the victims disability.

6.66. We will minimise the risk of allegations against other children, young people and adults by:

- Providing a developmentally appropriate PSHE syllabus (education provision) which develops students understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those children, young people and adults identified as being at risk
- Developing robust risk assessments & providing targeted work for children, young people and adults identified as being a potential risk to other children, young people and adults
- All Individuals will be provided with safeguarding information in a format which is appropriate for their understanding and communication. This may take the form of posters or a leaflet/booklet.

6.67. For more information regarding sexual violence and harassment please read:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/667862/Sexual_Harassment_and_Sexual_Violence_-_Advice.pdf

Sexting

6.68. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows to share media and messages. Sexting may also be called: trading nudes, dirties, pic for pic.

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

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

6.70. However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest. There are many reasons why a young person may want to send a naked or semi-naked picture, video or message to someone else:

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

6.71. The risks of sexting are that the young person has no control of images and how these are shared, and the subsequent risks of blackmail, bullying and harm.

6.72. In response to this Cambian Group will provide education to prevent individuals from becoming victims of such situation by encouraging them to think about the risk of sexting and understand how to seek help when approached to take part in sexting. More information can be found on:

https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/

Initiation/Hazing

6.73. 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.

6.74. 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.

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

Vulnerable Children and Young people and reporting incidents

6.76. Particular vigilance is exercised in respect of young people who are the subject of a Child/Young Person Protection Plan and any incidents or concerns involving these young people will be reported immediately to the allocated Social Worker.

Looked after Children (LAC)

6.77. The most common reason for children or young people being looked after is as a result of abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep these children and young people safe by working closely with the DSL and in the school setting the designated teacher responsible for LAC.

First Aid/Health and Medication (Please refer to our First Aid, Health and Medication Policies)

6.78. Except in cases of emergency first aid will only be administered by qualified First Aiders. If it is necessary for the Individual to remove clothing for first aid treatment there will always be another adult present. All first aid and non-routine changing or personal care will be recorded and, where significant, will be shared with parents/guardians/carers. Individuals requiring regular medication or therapies will have a medical plan which is agreed with parents/carers/guardians.

Abuse of Position of Trust

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

Volunteers

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

Contractors

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

Extended school and off-site arrangements

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

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

Use of mobile phones

6.84. Staff must behave in accordance with the Staff Code of Conduct and Internet and social media access including Cambian Phones Policy at all times.

6.85. All computer equipment and internet access within the home/school/college is subject to 'parental controls' and internet safety rules in line with our e-safety policy, Anti-bullying policy and Internet and social media access including Individual's use of mobile phones policy. Staff should not use any computer for personal reasons during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the many learning and social opportunities available through the internet and social media. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they should neither mention Northampton Cambian School or make reference to their employment at the Northampton Cambian School. Staff are advised not to communicate with parents, guardians, carers or Individuals via social networking sites

Photography and images

6.86. The vast majority of people who take or view photographs or videos of children and young person do so for entirely innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through taking or using images, so we must ensure that we have some safeguards in place.

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

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

Physical intervention and use of reasonable force

6.87. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are specific to the child, young people or young adults in line with our physical intervention training (such as MAPA® or PILLARS). Restraint will only be used as a last resort and all incidents of this are reviewed, recorded and monitored. Reasonable force will be used in accordance with government guidance.

Staff Taking Medication or other substances

6.88. Staff members must not be under the influence of alcohol or any other substance which may affect their ability to care for our children, young people and young adults. If they are taking medication they should seek medical advice and inform the Home Manager/Headteacher/Principal who will review the medical advice and take a decision as to whether they are fit for work. We only allow staff to work if medical advice confirms that their ability to look after children/young people/young adults is unlikely to be impaired. Should a member of staff need to bring their medication to the home/school/college, it must be securely stored and out of reach of all children, young people and young adults. GHR 12 Drug and Alcohol Policy.

Teaching and Learning

6.89. Our children, young people and adults are given opportunities through teaching and learning how to develop their knowledge and understanding of safeguarding and how to keep themselves safe; this can be formally through the curriculum and through informal opportunities.

Information for individuals and relatives/carers

6.90. Individuals, relatives and carers that go to a Cambian location will be given information regarding safeguarding. The format of the information given will take into account the age of the individual, and level of understanding. Safeguarding information will be available in a range of media and user friendly formats for individuals. These will explain clearly what abuse is and also how to express a concern or make a complaint. All visitors to each location will receive a Safeguarding Information Leaflet which includes contact details of all DSLs.

6.91. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt with independently and that they will be kept involved in the process to the degree that they wish to be. They will be reassured that they will receive help and support in taking action. They will also be advised that they can nominate an advocate or representative to speak and act on their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be appointed. They will be advised of rights to legal aid in where appropriate to victim support and compensation.

7. Accountability

7.1. Rebecca Hill is the Designated Safeguarding Lead (DSL) at Northampton Cambian School and has lead responsibility for protecting and safeguarding children, young people and young adults and liaising with the local authority and other local agencies as appropriate. This includes young person protections, referrals, raising awareness, training, allocating resources and supporting/directing staff within the Location. In all matters relating to young person protection and safeguarding Northampton Cambian School will follow the procedures outlined in this policy.

7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by the Head of Service. Our Operations Director, Joshua Fitzgerald will undertake a full annual review of the content and effective application of this policy and associated procedures. The date for the next scheduled review is set out on page 1. The policy will be reviewed earlier in accordance with changes in legislation, regulatory requirements or as a result of best practice guidance.

7.3. The Cambian Chief Operating Officer is the company's Safeguarding Lead.- She will support and promote the development of initiatives to improve the prevention, identification and response to abuse and neglect. She is the Board's safeguarding lead and is the director accountable for safeguarding is responsible for reporting to the Board and providing executive leadership. He/she is accountable for the governance of safeguarding.

7.4. Corporate Executive Board (CEB) - has a responsibility to ensure there is Board level leadership, an overall policy in place and an organisational culture which places Individuals and their wellbeing at the centre of safeguarding, and that endeavours to prevent harm, abuse, and neglect from occurring.

7.5. The Cambian Board operates a Quality & Safeguarding Committee which has authority to review the Company's systems and processes for identifying, evaluating and managing the operational quality, clinical risk and regulatory compliance matters faced by the Company and to report to the Chairman and make recommendations to the Board on the effectiveness of development, operation and function of such systems. The Committee's purpose To ensure that robust and effective arrangements (systems, processes, procedures and reporting) are in place with respect to Cambian's statutory responsibilities and duties for safeguarding and promoting the welfare of all children and young people. The committee meets quarterly and is chaired by a Non-Executive Director with designated responsibility for quality and safety.

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

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

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

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

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

Duty of Candour

7.11. 'The statutory Duty of Candour places a requirement on us as providers to be open with Individuals in our care and their families when there are failings or things go wrong. As a provider we have established a duty throughout our organisations, ensuring that honesty and transparency are the norm in every location registered by the CQC'. Staff should refer to the Duty of Candour policy.

Recruitment and vetting

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7.12. Our Cambian Recruitment Policy reflects Safer Recruitment guidelines and legislation in appendix I as well as carrying out further checks and precautions such as Good Conduct Certificates.

7.13. Single Central Record (SCR)- we keep a Single Central Record at each Cambian Location. This covers all staff including supply teaching and teacher trainees, agency care staff as well as all members of the proprietor body. This is regularly audited.

7.14. When we use agency staff we ensure we obtain written confirmation that all checks have been completed, in line **with safer recruitment, from the employment business that is supplying the member of agency staff. All Cambian** Locations must ensure that a contract exists between the Location and the agency to confirm that, in the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate before that person can begin work at the home/school/college. Cambian Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the agency.

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

Requirements to inform Disclosure and Barring Services (DBS)

7.16. We will report promptly to the DBS (but no longer than one month after leaving the Location), any person (whether employed, contracted, a volunteer or student) whose services are no longer required because he/she is considered unsuitable to work with children and young people. This includes making a referral where an employee has been dismissed (or would have been dismissed) had he/she not resigned beforehand.

Recording and information sharing

7.17. All contact with parents, carers and external agencies relevant to Children and Young Person Protection is logged and kept in confidential records. These can only be accessed by designated people within the home. The content of Young person Protection reports will be made available in advance of relevant meetings.

Record-keeping

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

7.19. Records should be, factual, accurate, concise, ethical and relevant.

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

7.21. There will be a safeguarding section/folder for each child/young person/young adult which will hold any concerns/safeguarding documentation for that individual. At the front of each folder there is an Index for Individual's Concerns. This is to enable the location to keep accurate records of any concerns raised regarding the individual and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure location.

7.22. Each location will also maintain a Central Log of Concerns of all concerns raised at the location including the safeguarding information where the concern has escalated. Where this is held as a paper version this is to be made into a bound booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies only. In either case this should be kept in a secure location.

Monitoring

7.23. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded, managed and responded to at the Location, at a regional level and at a whole divisional level [see Accountability section on Governance]. The cycle is informed by a weekly submission of Key Performance Indicators (KPIs) using **CambianKPI** and the identification and management of safeguarding risks.

Training

7.24. All staff will receive information regarding Safeguarding on induction. The induction introduces the new staff member to policy, procedure and practice at the location. They will also be orientated to where to find information regarding

safeguarding including relevant posters around the location. As part of their induction all staff are required to read this policy and confirm that they understand their role in safeguarding and protecting young people within our school/college/home.

7.25. All staff will complete mandatory training regarding safeguarding via the company's Achieve module. The module also has off-line activities which demonstrate transference of knowledge and are signed off by the line manager. This module is completed annually to maintain staff awareness of their responsibilities in relation to children /young people/young adult's Safeguarding at all times. The DSL will ensure all staff receive annual face to face safeguarding workshops. This can be undertaken in such forums as staff meetings etc. and recorded on Achieve. In addition to this safeguarding workshops are provided both by internal trainers and by external companies as required.

7.26. DSLs and Deputies DSLs attend safeguarding training every two years with their own local authority. Where a local authority does not provide this training they will attend training in line with the local authority guidance. This training must be updated annually

7.27. We provide role-appropriate and refresher training to all staff including those specific to the role of DSL and Deputy DSL, in accordance with Northampton County Council procedures and KCSIE (2018). We consult with Northampton County Council Safeguarding Children's Board to determine the schedule, level and focus for training. Safeguarding training provided by the Achieve module will include domestic abuse, forced marriage, modern day slavery, radicalisation and cyber bullying. The DSL is responsible for promoting awareness of:

Mental Health
Private Fostering
Prevention of Radicalisation
Sexting
CSE
Teenage Relationship Abuse
Trafficking
County Lines
Drugs
Fabricated and Induced Illness
Faith Abuse
Gangs
Children Missing from Education
Bullying
Domestic Violence
FGM
Forced Marriage
Gender and Honour - Based Violence

7.28. The Prevent strategy requires that our staff are trained so that they have the necessary knowledge and confidence to identify young people at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children and young people and young people for further help. Channel Preventing Radicalisation programme online general awareness training is used if there is difficulty in accessing local training. We also have a Preventing Extremism and Radicalisation policy.

Confidentiality

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

7.30. In certain circumstances it will be necessary to exchange or disclose personal information with other agencies. This must be done in accordance with relevant Cambian policies e.g. Data Protection/Confidentiality and all relevant legislation including the Data Protection Act 1998.

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7.31. When sharing safeguarding information regarding an individual, staff will consider the following:

Information should only be shared on a 'need to know' basis when it is in the best interests of the individual;

Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse or neglect, it may be necessary to override the requirement;

Distinguish fact from opinion.

Ensure you are giving the right information about the right person.

Ensure you are sharing information securely

7.32. Inform the person that the information has been shared if they were not already aware of this and if it would not create or increase risk of harm to them/others.

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

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

7.34. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for the Caldicott Guardian at our location is Anne Marie Carrie

7.35. Failure to follow this policy and location procedure may result in disciplinary action.

Complaints and Monitoring

7.36. All complaints arising from the operation of this policy will be considered under the complaints procedure, with reference to the our Designated Safeguarding Officer Rebecca Hill (DSL) and Northampton County council Safeguarding Children's Board

8. Standard Forms, Relevant Documents, Letters & References

Staff should read the following policies in conjunction with the safeguarding policy:

8.1. Anti-bullying Policy - 21

8.2. Behaviour Policy – CH02, OFSCH 08

8.3. Complaints Policy - 22

8.4. Data Protection – GIG 02

8.5. Duty of Candour - 97

8.6. First Aid Policy – GHS 04.10

8.7. Health Policy

8.8. Internet and social media access including phones

8.9. Medication Policy including Medication Errors - 60

8.10. Mental Capacity and Consent Policy - 13

8.11. Prevent Policy - 26

8.12. Recruitment Policy – GHR 03

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8.13. Serious Incidents Procedures - 35

8.14. Single Central Record

8.15. Staff Code of Conduct – GHR 11

8.16. Whistleblowing Policy – GHR 30

Listed below are the supporting documents for this policy

(Click to Open each one)

8.17. 25.01 - Index Form for Individuals Concern File

8.18. 25.02 - Individual Safeguarding Poster

8.19. 25.03 - Individual Safeguarding Poster – Easy Read

8.20. 25.04 - Concern Form

8.21. 25.05 - Safeguarding Tracking Pack

8.22. 25.06 – Safeguarding Information Leaflet

8.23. 25.08 - Central Log of concerns

8.24. 25.09 – Child Protection and Safeguarding Handbook for Staff

8.25. 25.10 – Guidance for staff who have had an allegation made against them

8.26. 25.11 – Concern or Witness Report

8.27. 25.12 – Local Safeguarding Procedure

8.28. 25.13 - Staff Safeguarding Information Poster

8.29. 25.14 – Guidance notes for Designated On Call Person

8.30. Appendix 1 (attached) – Statutory Legislation

8.31. Appendix 2 (attached) – Key Contacts

Further guidance / information

8.32. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information on its website www.nspcc.org.uk/preventing-abuse/.Our home/school/college can also access broad government guidance on the issues listed here via the GOV.UK website: young person sexual exploitation (CSE); bullying including cyber bullying; domestic violence; drugs; fabricated or induced illness; faith abuse; female genital mutilation (FGM); forced marriage; gangs and youth violence; gender-based violence/violence against women and girls (VAWG); mental health; private fostering; radicalisation; sexting; teenage relationship abuse; trafficking.

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9. Appendix 1: Statutory legislation

This policy complies with the following:

Working Together to Safeguard Children 2018

The guidance applies to all organisations and agencies who have functions relating to children. Specifically, applies to all local authorities, clinical commissioning groups, police and all other organisations and agencies as set out in chapter 2 of the guidance. It applies, in its entirety, to all schools. It applies to all children up to the age of 18 years whether living with their families, in state care, or living independently. The Children Act 2004, as amended by the Children and Social Work Act 2017, strengthens this important relationship by placing new duties on key agencies in a local area. Specifically the police, clinical commissioning groups and the local authority are under a duty to make arrangements to work together, and with other partners locally, to safeguard and promote the welfare of all children in their area.

Keeping Children Safe in Education - Sept 2018

This document sets out the legal duties with which schools and colleges must comply and also contains information on what schools and colleges should do in order to keep children safe. It should be read alongside statutory guidance Working Together to Safeguard Children, and departmental advice *'What to do if you are worried a child is being abused'* - advice for practitioners.

What to do if you're worried a child is being abused

All staff should read KCSIE Part 1. All staff working directly with children should read Part 1 and Annex A.

Keeping children safe in education part 1 -Sept 2018

There is also an overview of changes brought by Working Together to Safeguard Children - 2018 (Appendix 3) and Keeping Children Safe in Education – 2018, see Appendix .4

- The Children Act 2004, as amended by the Children and Social Work Act 2017
- Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes (England) Regulations 2015 in force as of 1st April 2015
- Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
- This policy is also in accordance with the Local Safeguarding Young people Board (LSCB) locally agreed inter-agency safeguarding processes and procedures
- Prevent Duty Guidance: for England and Wales (March 2015) (Prevent). Prevent is supplemented by The Prevent duty: Departmental advice for schools and young person minders (June 2015) and The use of social media for on-line radicalisation (July 2015)
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2015
- Female Genital Mutilation Act 2003, (as inserted by section 74 of the Serious Crime Act 2015)
- Terrorism Act 2000
- Counter Terrorism and Security Act 2015
- The School staffing regulations , England 2009
- The Teachers Disciplinary regulations, 2012
- Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.
- Safeguarding Children in Education 2010
- All Wales Child Protection Procedures 2008
- All Wales POVA Guidance 2008.
- Keep learners Safe 2015.

- Social services and wellbeing Act 2014

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10.Appendix II – Key Contacts

Designated Safeguarding Lead (DSL) Is Rebecca Hill

Telephone (24hrs) 01604719711 **Email: Rebecca.Hill@cambiangroup.com**

Deputy Designated Safeguarding Lead is Rob Bilbe

Telephone (24hrs) 01604719711 **Email: Rob.Bilbe@cambiangroup.com**

Headteacher/Principal/Home Manager is Rebecca Hill

Telephone (24hrs) 01604719711 **Email: Rebecca.Hill@cambiangroup.com**

Operations Director is Joshua Fitzgerald

Telephone (24hrs) **Email: Joshua.Fitzgerald@cambiangroup.com**

Directorate (Residential Services)

Safeguarding lead for Residential Services is Anne Marie Carrie (CEO Children's Services)

Telephone 07254 50771 (24hrs) **Email:** AnneMarie.Carrie@cambiangroup.com

Group
The Proprietor of the Young people's/care home is The Cambian Group. The Proprietor's representative is Anne Marie Carrie (CEO Children's Services) whose contact details are above.

Local authority
Northamptonshire Local Authority &Northamptonshire Safeguarding Children's Board

Telephone 01604 364036

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

Outside of office hours

101 police

The non-emergency police telephone number is: 111.

For young people under the age of 18:

The Local Authority Designated Officer (LADO) is
AndySmith-01604367862
Christine York- 01604 362633

Telephone Northampton County Council (Office hours: 9-10 or 3-5 Outside of office hours/weekends, the emergency duty team can be contacted on: 01452 614194.)

Local Safeguarding Children's Board/ Local Safeguarding Adult's Board (LSCB/LSAB)
The name, address and contact details for the Local Safeguarding Board is as follows:

Address: Northampton Safe guarding board, c/o Northampton county council, County hall, Northampton, NN11ED

Telephone (24hrs): 016046364036 **Email:** nscb@northamptonshire.gcsx.gov.uk

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11.Appendix 3: Changes brought by Working Together to Safeguard Children 2018

Who the guidance applies to and what it's replacing

1. Working Together to Safeguard Children (2018) replaces Working Together to Safeguard Children (2015).
2. The guidance applies to all organisations and agencies who have functions relating to children. Specifically, applies to all local authorities, clinical commissioning groups, police and all other organisations and agencies as set out in chapter 2 of the guidance. It applies, in its entirety, to all schools. It applies to all children up to the age of 18 years whether living with their families, in state care, or living independently.
3. The guidance focuses on the core legal requirements, making it clear what individuals, organisations and agencies must and should do to keep children safe. In doing so, it seeks to emphasise that effective safeguarding is achieved by putting children at the centre of the system and by every individual and agency playing their full part.
4. The Children Act 2004, as amended by the Children and Social Work Act 2017, strengthens this important relationship by placing new duties on key agencies in a local area. Specifically the police, clinical commissioning groups and the local authority are under a duty to make arrangements to work together, and with other partners locally, to safeguard and promote the welfare of all children in their area.

Purposes of safeguarding and promoting the welfare of children

5. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
    - protecting children from maltreatment
    - preventing impairment of children's health or development
    - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
    - taking action to enable all children to have the best outcomes
6. This child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.

Being alert to risk and specific situations

7. All Practitioners should, in particular, be alert to the potential need for early help for a child who:
    - is disabled and has specific additional needs
    - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
    - is a young carer
    - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
    - is frequently missing/goes missing from care or from home
    - is at risk of modern slavery, trafficking or exploitation
    - is at risk of being radicalised or exploited
    - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
    - is misusing drugs or alcohol themselves
    - has returned home to their family from care
    - is a privately fostered child

Lead Practitioner and other practitioners' role

8. A lead practitioner should undertake the assessment, provide help to the child and family, act as an advocate on their behalf and co-ordinate the delivery of support services. A GP, family support worker, school nurse, teacher, health visitor and/or special educational needs co-ordinator could undertake the lead practitioner role. Decisions about who should be the lead practitioner should be taken on a case-by-case basis and should be informed by the child and their family.
9. Practitioners should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or

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where a child is already known to local authority children's social care (e.g. they are being supported as a child in need or have a child protection plan).

10. Practitioners should be alert to sharing important information about any adults with whom that child has contact, which may impact the child's safety or welfare.

Having the right polices in place

11. Organisations and agencies working with children and families should have clear policies for dealing with allegations against people who work with children. Such policies should make a clear distinction between an allegation, a concern about the quality of care or practice or a complaint. An allegation may relate to a person who works with children who has:
    - behaved in a way that has harmed a child, or may have harmed a child
    - possibly committed a criminal offence against or related to a child
    - **behaved towards a child or children in a way that indicates they may pose a risk of harm to** children

Sharing information & GDPR

12. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern.
13. Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children.
14. Data protection legislation is not a barrier to sharing information. Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

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15. Consent is not always needed to share personal information. Practitioners do not necessarily need consent to share personal information. Wherever possible, they should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. Practitioners should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.

Children's Homes role and responsibility of Registered Managers

16. Children's homes - the registered person of a children's home must have regard to the Guide to the Children's Homes Regulations, including the quality standards (April 2015), in interpreting and meeting the Regulations. The Guide covers the quality standards for children's homes, which set out the aspirational and positive outcomes that we expect homes to achieve, including the standard for the protection of children. The registered person is responsible for ensuring that staff continually and actively assess the risks to each child and the arrangements in place to protect them. Where there are safeguarding concerns for a child, their placement plan, agreed between the home and their placing authority, must include details of the steps the home will take to manage any assessed risks on a day to day basis. In addition to the requirements of this standard, the registered person has specific responsibilities under regulation 34 to prepare and implement policies setting out: arrangements for the safeguarding of children from abuse or neglect; clear procedures for referring child protection concerns to the placing authority or local authority where the home is situated if appropriate; and specific procedures to prevent children going missing and take action if they do.
17. Each children's and young people homes should work with their local safeguarding partners to agree how they will work together, and with the placing authority, to make sure that the needs of the individual children are met.

Who is your Safeguarding Partner

18. A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017) as:

    - the local authority
    - a clinical commissioning group for an area any part of which falls within the local authority area
    - the chief officer of police for an area any part of which falls within the local authority area

The purpose of these local arrangements is to support and enable local organisations and agencies to work together in a system where:

- children are safeguarded and their welfare promoted
- partner organisations and agencies collaborate, share and co-own the vision for how to achieve improved outcomes for vulnerable children
- organisations and agencies challenge appropriately and hold one another to account effectively
- there is early identification and analysis of new safeguarding issues and emerging threats
- learning is promoted and embedded in a way that local services for children and families can become more reflective and implement changes to practice
- information is shared effectively to facilitate more accurate and timely decision making for children and families

The safeguarding partners should make arrangements to allow all schools (including multi academy trusts), colleges and other educational providers, in the local area to be fully engaged, involved and included in the new safeguarding arrangements. It is expected that local safeguarding partners will name schools, colleges and other educational

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providers as relevant agencies and will reach their own conclusions on how best locally to achieve the active engagement of individual institutions in a meaningful way.

12. Appendix 4: Changes brought by Keeping Children Safe in Education 2018

Keeping Children Safe in Education

Increased in length from 76 to 110 pages

Updates NCTL for Teaching Regulation Authority

Explains difference between 'must' (legal) and 'should' (follow unless a good reason not to)

More emphasis on understanding the issues for:

Care Leavers

Previously Looked After Children

Children with SEN and Disabilities

Peer on Peer Abuse

School's Safeguarding Policy

Individual schools and colleges having an effective child protection policy

Updated annually (as a minimum)

Publicly available (on website or otherwise)

Should reflect local circumstances

Children with SEN and Disabilities

The Policy should reflect additional safeguarding challenges for children with SEN and Disabilities including:

- Awareness that behaviour, mood and injury may relate to possible abuse and not just their SEN or disability
- Higher risk of peer group isolation
- Disproportionate impact of bullying
- Difficulties with communication

Schools should consider extra pastoral support for children with SEN and Disabilities

Online Safety

Many children have unlimited and unrestricted access to the internet via 3G and 4G

Schools need a clear policy on the use of mobile technology in the school

Contextual Safeguarding

Safeguarding incidents outside the school which may impact on adolescents

Assessments should include this wider picture

For more information, see the Contextual Safeguarding Network:
https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding

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Emergency Contacts

Where reasonably possible, more than one emergency contact number for each pupil

Use of reasonable force

Especially related to children with SEN and Disabilities

'Reasonable' means 'using no more force than is needed'

Draw up individual plans for vulnerable children to reduce use of force

Single Central Record

SCR needs to be up to date and accessible at each site

Volunteers

Schools must risk assess volunteers to decide whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity

Risk assessments must be recorded

Check for s128 prohibitions (in independent schools, free schools and academies) should be completed for:

- Governors/Trustees
- Head teachers
- Senior Leadership Team
- Departmental Heads

Will appear on enhanced DBS certificates

Schools and Alternative Providers (AP)

Schools should obtain written confirmation that the AP has completed all relevant checks on its staff

Proprietor-led Schools

DSL must be sufficiently independent, particularly in relation to any allegations involving the proprietor or members of the proprietor's family.

Written confirmation that duties involve contacting the LADO on any matter that the DSL considers cannot properly be dealt with internally

Consider providing the DSL with access to external advice or legal services

'Home-stays' in the UK

If the school arranges the home-stay, they should obtain an enhanced DBS for everyone in the home over 18 years old

Schools are 'free to decide' if they should get enhanced DBS checks for those who are 16 or 17 years old.

There should be no charge for these DBS checks as they are for volunteers

Peer on Peer Abuse

- Bullying (including cyberbullying)
- Physical abuse

- Sexual violence and sexual harassment
- Sexting
- 'initiation ceremonies'

Child Protection policy includes:

- How the risk of peer on peer abuse will be minimised
- How allegations are recorded and dealt with
- How victims and perpetrators will be supported
- That this abuse should never be tolerated as "banter"
- Recognition of the gendered nature
- All peer on peer abuse will be taken seriously
- The different forms peer on peer abuse can take

Sexual violence and Sexual Harassment between children

This forms Part 5 of Keeping children safe in education

Summary of the separate guidance first published in December 2017, but reissued in May 2018

What all staff should know

All staff should read KCSIE Part 1

All staff working directly with children should read Part 1 and Annex A

Induction Training

Must now include:

Behaviour Policy

Schools response to children missing education

Annex A

Children and the court system (as witnesses)
Children missing from education
Children with family members in prison
Child Sexual exploitation
County lines
Domestic abuse
Homelessness
So-called 'honour-based' violence
Preventing radicalisation
Peer on peer abuse
Sexual violence and sexual harassment

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