

# Policy and Procedure on Child Protection and Safeguarding (Children and Adults)

Bletchley Park School

Policy Author	Policy and Performance Team – children’s services
Approval Date	September 2020
Next Review Date	August 2021
Version No	10
Policy Level	Children’s Services
Staff Groups Affected	All Staff

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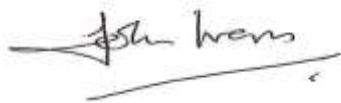
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## 1. Monitoring and review

- 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 Teacher.

Signed:



John Ivers

**Proprietor and Cambian Group Safeguarding Lead**

Date: August 2020



Laura Sharman

**Head Teacher**

August 2021

## 2. Terminology

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

<b>'Establishment' or 'Location'</b>	This is a generic term which means the Children's Home/school/college.
<b>Individual</b>	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Bletchley Park we have young people attending our school between the ages of 7 and 19 years.
<b>Head Teacher</b>	This is the senior person with overall responsibility for the school. At Bletchley Park this is the Headteacher, Laura Sharman.
<b>Key Worker</b>	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
<b>Parent, Carer, Guardian</b>	Means parent or person with Parental Responsibility
<b>Regulatory Authority</b>	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
<b>Social Worker</b>	This means the worker allocated to the individual's family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
<b>Placing Authority</b>	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
<b>Staff</b>	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
<b>CambianKPI</b>	The online in-house information system which holds data for each site on quality measures.
<b>Safeguarding Partners, LADO, LSAB, POVA</b>	<ul style="list-style-type: none"> <li>Safeguarding Partners- the local authority, a clinical</li> </ul>

commissioning group for an area within the local authority and the chief officer of police for an area (any part of which falls) within the local authority area.

- Local Authority Designated Officer
- Local Safeguarding Adults Board
- Protection of Vulnerable Adults

### 3. Definitions

#### Age related arrangements

- 3.1. **Children and Young people are under 18.** Working together to Safeguard Children (2018) and Keeping Children Safe in Education (2020) only applies to children and young people until they reach the age of 18. From September 2019 LSCBs have been replaced by Safeguarding Partners which context of has been covered in Multi – agency working section in this policy and procedure. There are often referred to as the Local Children Safeguarding Partners (LCSPs).
- 3.2. **Adults are over the age of 18.** Over 18 year olds are covered by the Local Safeguarding Adult Boards (LSABs). Government guidance can be gained from the Care Act 2014. 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 their particular care and support needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect'. We refer to adult service users in our provision as **young adults** due to the fact we provide children's services up to the age of 25.
- 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the legal framework for social service provision in Wales. It sets out what must and should be done to safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and ensure the effectiveness of work to protect and promote the welfare of children.
- 3.4. Staff working with young adults aged 18 and over will follow the safeguarding referral process to LSAB/MASH/POVA Teams depending on local arrangements.

#### Multi agency working – Safeguarding Partners

- 3.5. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children [here](#).
- 3.6. New safeguarding partners (although it may not be referred to consistently as 'Safeguarding Partners' across England yet) and child death review partner arrangements are now in place.
- 3.7. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority and the chief officer of police for an area (any part of which falls) within the local authority area will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- 3.8. It is especially important that schools and colleges understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.
- 3.9. The three safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement that the three

safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. The three safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements.

- 3.10. The three safeguarding partners should make arrangements to allow all schools (including those in multi-academy trusts) and colleges in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

### Data Child protection

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

### Safeguarding definition – Working together to safeguarding children 2018

- 3.12. **Safeguarding children and young people** is the action that is taken to promote the welfare of children and protect them from harm. It means:
- Protecting children from abuse and maltreatment,
  - Preventing harm to children's health or development,
  - Ensuring children grow up with the provision of safe and effective care,
  - Taking action to enable all children and young people to have the best outcomes.

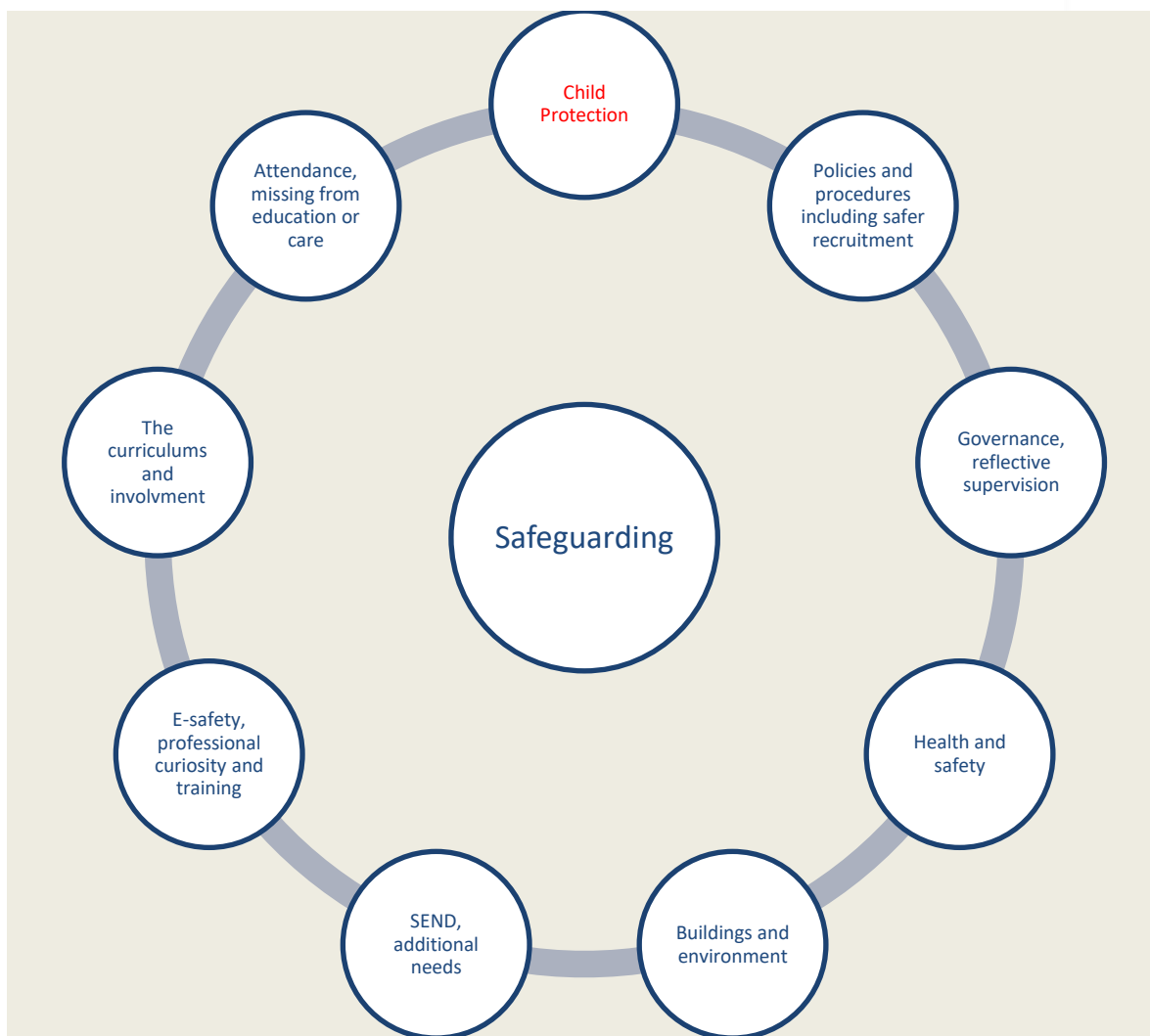
### Safeguarding definition – Keeping Children Safe in Education 2020

- 3.13. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
- Protecting children from maltreatment,
  - Preventing impairment of children's **mental and physical health** or development,
  - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
  - Taking action to enable all children to have the best outcomes.
- 3.14. DSL is under a duty to work with senior mental health leads, internally and where required, externally.

### The difference between safeguarding and child protection

- 3.15. In relation to children's services - in practice safeguarding is the policies and practices that schools/colleges/children's homes employ to keep children safe and promote their well-being. This means everything from security of the buildings, to the safe recruitment of staff and everything in between. This diagram 1. sets out what Safeguarding in children's services means:

Diagram 1.



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

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

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

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

#### Abuse and neglect – child and adults context

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

- 3.20. Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse - children**. Also the signs that someone could be a victim (**Appendix 6**) or an abuser (**Appendix 7**) have been explored. Parents, carers and other people can harm children and young people by direct acts and/or failure to provide proper care. It should also be understood and appreciated that children can also be abused by being sexually exploited, honour based abuse, forced marriage or female genital mutilation and through online social media. See **section 6 - High Risk Emerging Safeguarding issues**.
- 3.21. In the context of an adult, abuse is a violation of a person's human and civil rights by another person or persons and may result in significant harm to, or the exploitation of, the person subjected to it.
- 3.22. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children**, there are other forms of abuse in relation to adults such as: domestic violence, financial and material, neglect or act of omission, modern slavery, discriminatory abuse, organisational and institutional and self-neglect. These are explained in more detail in **Appendix 5 – Types of abuse – Adults**.
- 3.23. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a care home, school or in a college. It can happen when someone lives alone or with others. Anyone can carry out abuse or neglect. Abuse can be intentional or unintentional, it may be a single act or repeated acts.

## 4. Purpose

- 4.1. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance**, and it complies with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information Poster**. This policy also complies with MKSCB, NSCB, Bucks LSCB, HSCP, Central Beds LSCB, Bedfordshire LSCB and OSCB's model safeguarding policy and complies with locally agreed procedures. Relevant printed copies of the Local Safeguarding Children's Partnerships (LSCP) and Local Safeguarding Adults Board (LSAB), Protection of Vulnerable Adults (POVA) procedures are available in every setting.
- 4.2. All policies and procedures for child protection and safeguarding must be undertaken in accordance with the requirements of the local authority in which the establishment is situated. In the event that the local authority safeguarding board 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.
- 4.3. This policy, and supporting information in various accessible forms, is made available to all Individuals, staff and parents associated with Cambian Bletchley Park School to ensure that everyone is clear on procedures for ensuring the protection of children and safeguarding children and young adults.
- 4.4. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11. Staff Code of Conduct**.
- 4.5. In addition, staff should be aware of and have access to the **NSPCC whistle-blowing helpline number 0800 028 0285** and the Cambian Whistleblowing telephone service operated by **EXPOLINK on 0800 111 4298**.

### When the Police should be called

- 4.6. There is a document which is referenced in Keeping Children Safe in Education 2020: 'When to call the police' available [here](#), the document has been produced by the National Police Chiefs Council (NPCC).
- 4.7. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

## 5. Policy

### Safeguarding culture of the organisation

- 5.1. All staff in Cambian schools and colleges must read at least **Part one of KCSiE2020** guidance and school/colleges should have a record to confirm this has been completed prior to 1<sup>st</sup> September 2020.



- 5.2. As an organisation we have a clear set of guidelines to make sure we deal with child protection and safeguarding concerns effectively.
- 5.3. Cambian safeguarding culture can be best described as:
  - **Proactive**, being professionally curious to determine further information in the interests of the child. It is essential that staff exercise professional curiosity at all times as it is likely that signs of any form of abuse including neglect will be identified when dealing with an un-associated incident. Having strong governance and monitoring, raising awareness through and enhancing children's and young people's capacity around the risks and their own safety, regular reflective supervision).
  - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other professionals in timely manner, active listening, applying theory in practice in a methodical way)
  - **Reflective** (understanding 'how we got there in the first place', completing a reflective account of events, involving other key professional in future planning, identifying actions and further changes to be made.
- 5.4. Child Protection and Safeguarding is everyone's responsibility. Everyone working for or visiting our locations has a responsibility to understand and implement this policy and related procedures at all times.
- 5.5. All Individuals in our services have a right to feel safe, secure and be protected from harm.
- 5.6. As a provider of specialist education and care services it is imperative that all staff are aware that all Individuals with Special Educational Needs (SEN) and disabilities;
  - Are more likely to be abused or neglected;
  - May display behaviour, mood and/or injury which may relate to possible abuse and not just their SEN or a particular disability.
  - Have a higher risk of peer group isolation.
  - Can be disproportionally impacted by things like bullying without outwardly showing any signs.
  - Experience communication barriers and difficulties in overcoming these barriers.
- 5.7. The most common reason for children or young people being looked after is as a result of abuse/neglect. We will ensure all staff have the skills, knowledge and understanding to help keep children and young people safe.
- 5.8. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence (KCSiE2020).
- 5.9. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care home or in the community, taking into account contextual safeguarding, see **section 6 - High Risk Emerging Safeguarding issues** and **section 7. Safeguarding issues relating to individual children and young people needs**.
- 5.10. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding of safeguarding, through both the formal curriculum and informal opportunities.
- 5.11. As an organisation we acknowledge that working in partnership with other agencies protects Individuals and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children and will equally work through safeguarding adults' procedures as directed by local procedures.
- 5.12. A comprehensive list of all supporting documentation and related policies, procedures and guidance referred to in this document can be found in separate appendices at the end of this document.



## Keeping Children Safe in Education 2020 (KCSiE2020) Statutory Guidance

- 5.13. On 1<sup>st</sup> September 2020 KCSiE2020 guidance ([here](#)) replaces Keeping Children Safe in Education September 2019. The statutory guidance should be read and followed by the **Proprietor(s) of independent schools** and non-maintained special schools and colleges.
- 5.14. All staff in Cambian schools and colleges must read **at least Part one of KCSiE2020 guidance** [here](#) and schools/colleges should have a record to confirm this has been completed prior to 1<sup>st</sup> September 2020.
- 5.15. A table of changes is included at **Annex H** of KCSiE2020 guidance which can also be accessed [here](#).
- 5.16. The guidance should be read alongside:
  - statutory guidance Working Together to Safeguard Children [here](#).
  - departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners [here](#); and;
  - departmental advice about [Sexual violence and sexual harassment between children in schools and colleges](#) [here](#).
- 5.17. The department issued non-statutory interim guidance on safeguarding in schools, colleges and other providers during the coronavirus outbreak. This guidance has now been withdrawn as the government expects all settings across the nation to reopen for the new academic year in September, with full availability to all learners. Requirements for local interventions in educational settings will continue to be reviewed.
- 5.18. On the 15<sup>th</sup> July DSL/Deputy DSLs within Education division, some Representative from Children's residential care (Senior Managers), Heads/Principals, Representatives of Business Support Functions and nominated Directors have attended KCSiE2020 webinar provided by the Safeguarding Network. Following the webinar, recording and the additional learning resources from the webinar have been shared with the participants for the wider dissemination to their teams.
- 5.19. All schools and colleges which are members of the Safeguarding Network should plan how the learning will be take place with their staff and organise KCSiE2020 knowledge check (via Safeguarding Network) and ensure that the record of completed knowledge check is stored on the Learning and Development platform agreed by MD of Education.
- 5.20. The Heads/Principals and DSLs should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of this guidance.
- 5.21. DfE made changes in three circumstances. Firstly, where legislation has required it e.g. reflecting mandatory Relationship Education, Relationship and Sex Education and Health Education from September 2020. Secondly, where DfE have helpful additional information that will support schools and colleges protect their children e.g. mental health, domestic abuse, child criminal and sexual exploitation and county lines. Finally, important clarifications which will help the sector better understand and/or follow the guidance.
- 5.22. The changes including those related to terminology will be explored throughout this policy.

## 6. High Risk Emerging Safeguarding Issues

The following Safeguarding issues are all considered to be child/young adult protection issues and should be referred immediately to the most relevant agency.

### Contextual safeguarding

- 6.1. Contextual Safeguarding is 'an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools/colleges and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore children's social care practitioners need to engage with individuals and sectors

who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts’.

- 6.2. We will consider the various factors that have an interplay with the life of any child/young person about whom we have concerns within the setting and the level of influence that these factors have on their ability to be protected and remain free from harm particularly when it comes to child exploitation or criminal activity.
- 6.3. Whilst this term applies to this specific definition, the notion of considering a child/young person within a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the school/college/home gates, within their family home, within the family and within the community are key considerations when the DSL is looking at any concerns.

## Bullying

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

## Peer on peer / child on child abuse

- 6.5. All staff should be aware that **children can abuse other children** (often referred to as peer on peer abuse).
- 6.6. This is most likely to include, but not limited to: bullying (including cyber bullying), physical abuse (hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), sexual violence (such as rape, assault by penetration), sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse), gender based violence, upskirting (which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm), sexting (also known as youth produced sexual imagery) and initiation/hazing type violence and rituals.
- 6.7. Staff must be clear as to the school or college’s policy and procedures with regards to peer on peer abuse.
- 6.8. Abuse is abuse and should never be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’.
- 6.9. 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.
- 6.10. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be challenged by staff and appropriate levels of action, which may include disciplinary action being taken. This to ensure children/young people and staff are clear that these behaviours will not be tolerated or acceptable. However, it is critical to state that some children with cognitive impairment may not be able to fully understand how children on the receiving end of such behaviour may feel, therefore staff will work with each of the children affected by the situation in order to enhance their understanding of the seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

## Peer on peer/child on child abuse and sexual violence and harassment

- 6.11. Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 6.12. **Sexual violence** is rape, assault by penetration or sexual assault. **Sexual harassment** is unwanted conduct of a sexual nature. **Harmful sexual behaviour** is problematic, abusive and violent behaviour that is developmentally inappropriate and may cause developmental damage. More information can be found in DfE (2018): [Sexual violence and sexual harassment between children in schools and colleges](#)

- 6.13. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is **"harmful sexual behaviour"**. The term has been widely adopted in child protection and is used in this advice. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context.
- 6.14. 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 other communities might be particularly vulnerable.
- 6.15. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- 6.16. Situations where children/young people are forced or coerced into sexual activity by peers or associates can be related with gang / serious youth violence activity but that is not always the case. Peer influence or peer pressure is a major factor in the decisions made by young people to join particular groups. Many young people see it as a "way out" from their day to day life and feel a strong bond with their peers, one which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying include:
- **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status.
  - **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender is used as a weapon by boys or girls, this may also include any of the following:
    - spreading rumors about someone's alleged sex life
    - using offensive terms to describe a person
    - inappropriate touching or attempts to do so
    - non-consensual sharing of sexual images and videos
    - unwanted sexual comments and messages, including those on social media
    - any sexual exploitation, coercion and threats
    - sexual assault and rape
  - **Upskirting** - taking a picture under a person's clothing without their permission and /or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim The Voyeurism Offences Act, which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.
  - **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are transgender, thought to be transgender, or whose gender expression doesn't conform to traditional gender roles. Transphobia can prevent transgender and gender nonconforming people from living full lives free from harm.
  - **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual orientation);
  - **Disablist Bullying** - targets a young person solely based on their disability. This can include manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a certain aspect of the victim's disability.

- 6.17. Reports of sexual violence and sexual harassment between children and young people are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education and care is not disrupted. It is also important that other children, young people and staff are supported and protected as appropriate.
- 6.18. We will minimise the risk of peer on peer abuse and sexual violence and harassment by:
- 6.19. Raising awareness amongst our staff to ensure they are aware of the importance of:
- 6.20. making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- 6.21. not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- 6.22. Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- 6.23. Providing a developmentally appropriate PSHE syllabus (education provision) which develops students understanding of acceptable behaviour and keeping themselves safe
- 6.24. Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- 6.25. Delivering targeted work on assertiveness and keeping safe to those children, young people and adults identified as being at risk
- 6.26. 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
- 6.27. 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.

#### Online Safety and Social Media – teaching online safety in schools

- 6.28. As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, governing bodies and proprietors should ensure appropriate filters and appropriate monitoring systems are in place. Additional information to support governing bodies and proprietors keep their children safe online (including when they are online at home) is provided in KCSiE2020 Annex C [here](#).
- 6.29. [Teaching Online Safety in Schools](#) is a useful reminder to include reporting and acting on online safety concerns related to the child protection, behaviour policy and anti - bullying policy. Children and young people should be just as clear about what is expected of them online as offline. This should complement existing and forthcoming subjects including Relationships Education, Relationships and Sex Education, Health Education, Citizenship and Computing. It does not imply additional content or teaching requirements.
- 6.30. Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children and young people use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children and young people vulnerable and to abuse them.
- 6.31. Online safety also encompasses access to the internet via 3G, 4G and 5G on mobile phones in the school/college, it is important to consider how this is managed on the premises.
- 6.32. With the current speed of on-line change, some parents/carers and staff have a limited understanding of online risks and issues. Parents/carers/staff may underestimate how often children and young people come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint

- 6.33. Services will therefore seek to provide information and awareness to children and young people and their parents/carers through:
- Acceptable use agreements for children/young people and staff
  - Activities including curriculum activities involving raising awareness around staying safe online
  - Information included in letters, newsletters, web site
  - Key worker session/ communication with parents/carers e.g. via newsletters and regular updates e.g. weekly calls
  - High profile events / campaigns e.g. Safer Internet Day
  - Building awareness around information that is held on relevant web sites and or publications
  - 027. E –safety policy available to all staff

### Cyberbullying

- 6.34. Central to 021. Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all children/young people have a right not to be bullied’. School/colleges also recognises that it must take note of bullying perpetrated outside school/college which spills over into the school/college; therefore once aware services will respond to any cyber-bullying we become aware of carried out by children/young people when they are away from the site.
- 6.35. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself.’
- By cyber-bullying, we mean bullying by electronic media:
  - Bullying by texts or messages or calls on mobile ‘phones
  - The use of mobile ‘phone cameras to cause distress, fear or humiliation
  - Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
  - Using e-mail to message others
  - Hijacking/cloning e-mail accounts
  - Making threatening, abusive, defamatory or humiliating remarks in on-line forums
- 6.36. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.
- 6.37. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
- 6.38. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.
- 6.39. If services become aware of any incidents of cyberbullying, they will need to consider each case individually as to any criminal act that may have been committed. The services will pass on information to the police if it feels that it is appropriate or is required to do so.

### Opportunities to teach safeguarding including online safety

- 6.40. Governing bodies and proprietors should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum.
- 6.41. This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which was made compulsory from September 2020. Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a

phased approach (if needed) when introducing these subjects. The statutory guidance can be found here [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#). Colleges may cover relevant issues through tutorials. The following resources may help schools and colleges:

- DfE advice for schools: teaching online safety in schools [here](#)
- UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected-world [here](#)
- National Crime Agency's CEOP education programme: Thinkuknow [here](#)
- Public Health England: Rise Above [here](#)

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

## Gaming – raising awareness

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

## Sexting

- 6.43. 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 enables the sharing of media and messages. Sexting may also be called: trading nudes, dirties, pic for pic.
- 6.44. 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:
- 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.
- 6.45. However, 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
- 6.46. The risks of sexting are that the young person has no control over the images and how these are shared, and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide education and guidance to prevent individuals from becoming victims of such situations 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: [Keeping-children-safe/online-safety/sexting-sending-nudes](#).

## Online reputation

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

## Grooming



- 6.48. On-line grooming is the process by which one person with an inappropriate sexual interest in children/young people will approach a child/young person on-line, with the intention of developing a relationship with that child/young person, to be able to meet them in person and intentionally cause harm.
- 6.49. The services will build awareness amongst children/young people, parents/carers and staff about ensuring that the child/young person:
- Only has friends on-line that they know in real life
  - Is aware that if they communicate with somebody that they have met on-line, that relationship should stay on-line.
- 6.50. Where appropriate that the services will support parents/carers to:
- Recognise the signs of grooming
  - Have regular conversations with their children/young people about on-line activity and how to stay safe on-line
- 6.51. Where appropriate the services will raise awareness by:
- Regular communication with the families
  - Schools/colleges will include awareness around grooming as part of their curriculum
  - Identifying with the families and children/young people how they can be safeguarded against grooming.

### Violence against women and girls (VAWG)

- 6.52. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women and girls. The government has a strategy looking at specific issues that women and girls face.
- 6.53. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to equal participation of women and men in social, economic, and political spheres. Such violence impedes gender equality and the achievement of a range of development outcomes. VAWG is a complex and multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention of and response to such violence require coordinated action across multiple sectors.

### Female genital mutilation (FGM)

- 6.54. 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, hence interferes with the natural function of girls' and women's bodies. It has no health benefits and harms girls and women in many ways.
- 6.55. The age at which girls undergo FGM varies enormously according to the community in which they live. The procedure may be carried out when the girl is new-born, 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 to 8 years and therefore girls within that age bracket are at a higher risk.
- 6.56. In 2003 FGM became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

### Forced marriage

- 6.57. 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 UK are under 18 years old.
- 6.58. It is important that all members of staff recognise the presenting symptoms, know how to respond if there are concerns and where to turn for advice.
- 6.59. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151** and locally through the local police safeguarding team or children's social care.



- 6.60. 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.

### Breast ironing

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

### Teenage relationship abuse

- 6.63. Research has shown that teenagers don't readily understand what constitutes abusive behaviour such as controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen relationships.
- 6.64. Further research shows that teenagers don't understand what consent means within their relationships. They often hold the common misconception that rape can only be committed by a stranger down a dark alley and don't understand that it could happen within their own relationships. This can lead to these abusive behaviours feeling 'normal' and therefore unchallenged as they are not recognised as being 'abusive'.
- 6.65. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their own, their peers or others behaviour towards them. Therefore significant effort will be made to raise awareness of it and respond effectively to such situations.
- 6.66. In response to this Cambian Group will provide education and guidance to prevent teenagers from becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within relationships.

### Honour-based violence

- 6.67. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. However, abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take" for example, honour-based violence might be committed against individuals who:
- become involved with a boyfriend or girlfriend from a different culture or religion
  - want to get out of an arranged marriage
  - want to get out of a forced marriage
  - wear clothes or take part in activities that might not be considered traditional within a particular culture.
- 6.68. Girls and women are the most common victims of honour-based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced marriage, being held against their will or taken somewhere they don't want to go.
- 6.69. If staff believe that the Individual 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 Individual is at

immediate risk the police will be contacted in the first place, this is a mandatory duty placed on teachers. It is important that if honour-based violence is known or suspected, communities and family members must NOT be contacted prior to referral to the police or social care as this could increase the risk to the individual.

### Preventing extremism and radicalisation

- 6.70. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing Extremism and Radicalisation policy** and **0.27 E-safety policy** we all need to be vigilant in ensuring the safety from extremist and terrorist material when accessing the internet. We take into account Milton Keynes Local Authority Safeguarding Children's Board arrangements to fulfil its Prevent duties. Cambian supports Individuals in making positive choices about their lives and endorses the Channel early intervention scheme for those who could be at risk of radicalisation. We use Channel for co-ordinated advice and guidance as appropriate depending upon individual needs.
- 6.71. The Prevent duty 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 online general awareness training is available on [http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html) if there is difficulty in accessing local training.

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

- 6.72. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.
- 6.73. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, control, manipulate or deceive a child into sexual or criminal activity. This might be (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can occur through the use of technology'.
- 6.74. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 6.75. Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation. However, it is important to recognise that any child can be targeted.
- 6.76. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.
- 6.77. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex) or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in KCSiE2020/Annex A - [here](#).  
Some of the following can be indicators- CCE:
- Children who appear with unexplained gifts or new professions;

- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly or come home late; and
- Children who regularly miss school or education or do not take part in education.

The following can be indicators – CSE:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

6.78. As an organisation we do recognise that the same level of exploitation may take place involving vulnerable young people/adults at risk above the age of 18. An adult 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 (The Care Act 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that the above statement will equally apply to those who are 18+ across England and Wales.

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

## County Lines

6.80. County lines is a term used to refer to gangs and criminal networks involved in exporting illegal drugs into one or more areas within the UK, using a dedicated mobile line/ other form of deal line. An order is placed on the number and typically a young person will deliver class 'A' drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas.

6.81. Children can be targeted and recruited. Exploitation is an integral part of the county lines, children may become victims through: coercion, intimidation, violence (including sexual) and weapons.

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

6.83. 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 to a gang, but who have developed networks across geographical boundaries to access and exploit existing drugs markets in these areas.

6.84. 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.

6.85. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism ([here](#)) should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

## Cuckooing

6.86. This is the exploitation of young people that might be vulnerable 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.

- 6.87. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem in the South of England. The crime is named for the cuckoo's practice of taking over other birds' nests for its young.
- 6.88. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms. More information about knife crime can be found in **Appendix 10. Knife crime – safeguarding children and young people**.
- 6.89. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally exploited include:
- Increase in missing episodes (Education and/or Care) – particular key as children/young people can be missing for days and drug run in other counties
  - Having unexplained amounts of money, new high cost items and multiple mobile phones
  - Increased social media and phone/text use, almost always secretly
  - Older males in particular seen to be hanging around and driving
  - Having injuries that are unexplained and unwilling to be looked at
  - Increase in aggression, violence and fighting
  - Carrying weapons – knives, baseball bats, hammers, acid
  - Travel receipts that are unexplained
  - Significant missing cases from education and disengaging from previous positive peer groups
  - Parents/carers concerns and significant changes in behaviour that affect emotional wellbeing
- 6.90. We will treat any child/young person who may be criminally exploited as a victim in the first instance and refer to the Local Children Safeguarding partnership/LSAB in the first instance. If a referral to the police is also required as crimes have been committed on the school premises, these will also be made.

### Missing young people and the link between missing and county lines

- 6.91. 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.
- 6.92. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of someone going missing. 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.
- 6.93. 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.

### Domestic abuse

- 6.94. The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

- 6.95. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 6.96. Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. More information about Operation Encompass can be found [here](#).

### Serious Violent Crime

- 6.97. All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:
- increased absence from school with a significant decline in performance,
  - a change in friendships or relationships with older individuals or group,
  - signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries,
  - unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs.
- 6.98. All staff should be aware of the associated risks and understand the measures in place to measure these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance - September 2018](#).

### Mental Health

- 6.99. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing of their pupils.
- 6.100. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- 6.101. Schools, colleges and homes can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance [here](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people. See Rise Above [here](#) for links to all materials and lesson plans.
- 6.102. Senior Leaders within schools and colleges, have a responsibility to ensure that all staff are aware that mental health problems.
- 6.103. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff suspect this might be the case they should report their concerns to a senior leader within the school and if possible bring their concerns to a member of the clinical team.
- 6.104. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff receive appropriate education and training so that they are aware of how these children's experiences, can impact on their mental health, behaviour and education.

- 6.105. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken. Staff should follow their child protection policy and speak immediately to the designated safeguarding lead or a deputy.
- 6.106. The DfE has published advice and guidance on Preventing and Tackling Bullying [here](#), and Mental Health and Behaviour in Schools [here](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing [here](#). Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above [here](#) for links to all materials and lesson plans.

## Human trafficking and modern slavery

- 6.107. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process that is a combination of:
- Movement (including within the UK);
  - Control, through harm / threat of harm or fraud
  - For the purpose of exploitation
- 6.108. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a life of abuse, servitude and inhumane treatment.
- 6.109. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is significant evidence that children/young people/young adults (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.
- 6.110. There are a number of indicators which suggest that a child/young person/young adult may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:
- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
  - Has a history with missing links and unexplained moves
  - Is required to earn a minimum amount of money every day
  - Works in various locations
  - Has limited freedom of movement
  - Appears to be missing for periods
  - Is known to beg for money
  - Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
  - Is one among a number of unrelated children found at one address
  - Has not been registered with or attended a GP practice
  - Is excessively afraid of being deported.
- 6.111. For those children/young people/young adults who are internally trafficked within the UK indicators include:
- Physical symptoms (bruising indicating either physical or sexual assault)
  - Prevalence of a sexually transmitted infection or unwanted pregnancy
  - Reports from reliable sources suggesting the likelihood of involvement in
  - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
  - Evidence of drug, alcohol or substance misuse
  - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
  - Relationship with a significantly older partner
  - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
  - Persistently missing, staying out overnight or returning late with no plausible explanation
  - Returning after having been missing, looking well cared for despite having not been at home
  - Having keys to premises other than those known about



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

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

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

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

6.115. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be reported to the DSL/RM/Head Teacher for referral to be considered to LSCP/LSAB/POVA.

### Initiation/Hazing

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

6.117. 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.

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

## 7. Safeguarding issues relating to Individual children and young people needs

### Homelessness

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

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

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



- 7.4. Guidance on how local authorities should exercise their homelessness functions in accordance with the Homelessness Reduction Act 2017 from 3 April 2018 can be downloaded [here](#).
- 7.5. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young people and the DSL should ensure appropriate referrals are made based on the Individual's circumstances.
- 7.6. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into the Local Children safeguarding partnership/LSAB where an Individual has been harmed or is at risk of harm.

#### Private Fostering

- 7.7. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more.
- 7.8. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.
- 7.9. The Law requires that the carers and parents must notify the Children's Services Department of any private fostering arrangement.
- 7.10. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is being privately fostered they will inform the Children's Services Department and inform both the parents and carers that they have done so.

#### Child and the Court System

- 7.11. As an organisation we recognise that children/young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore services across the organisation will aim to support children through this process.
- 7.12. Along with information, advice and guidance, services will use age-appropriate materials published by HM Courts and Tribunals Services (2017) [here](#) that explain to children/young people what it means to be a witness, how to give evidence and the help they can access.
- 7.13. We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be very stressful for children. Services will support children/young people going through this process.
- 7.14. Alongside information, advice and guidance services will use online materials published by The Ministry of Justice (2018) which offers children/young people information & advice on the dispute resolution service [here](#). These materials will also be offered to parents and carers if appropriate.
- 7.15. Ensure that children/young people are sufficiently supported where a parent has been sent to prison, adequate support includes protection from: stigma, isolation and poor mental health.

#### Fabricated or induced illnesses (FII)

- 7.16. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.
- 7.17. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).
- 7.18. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This ranges from extreme neglect (failing to seek medical care) to induced illness.
- 7.19. Behaviours in FII include a parent/carer who:

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

## 8. Child Protection and Safeguarding Procedures

### Roles and responsibilities

- 8.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and abuse and which encourages reporting of breaches of this policy using the appropriate procedures.
- 8.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors, partner organisations and visitors are aware of the policy and are supported to implement and work in accordance with it, as well as creating a management culture that encourages a focus on safeguarding. They must ensure that they are responsive, acting immediately if they become aware of any safeguarding concerns, and supportive towards employees or volunteers who complain about breaches in this policy.
- 8.3. The **Designated safeguarding Lead (DSL)** is responsible for handling reports and/or concerns, about the protection of children, young people and adults, appropriately and in accordance with the procedures that underpin this policy.



- 8.4. **Our Designated Safeguarding Lead (DSL)** is Sarah Stacey who is a senior member of our leadership team. The role of the Designated Safeguarding Lead is to:
  - Ensure this child protection and safeguarding policy and local arrangements are known, understood and used appropriately.
  - act as a point of contact with the three safeguarding partners
  - Take lead responsibility for referring and managing safeguarding issues and cases, unless management of a particular case is passed on to a more senior member of the organisation – see section of allegations.
  - Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Board (child or adult) and Local Authority Designated Officer (LADO).
  - Refer cases to the Channel programme where there is a radicalisation concern as required.
  - Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the Disclosure and Barring Service as required; and
  - Refer cases where a crime may have been committed to the Police as required.

- Act as a source of advice, support and expertise within the location when deciding to make a referral by liaising with relevant agencies.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Identify staff 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 the wellbeing of children and young people placed in our [home/school/college] is in constant focus and that they are guarded from harm or abuse.
- Ensure the child protection and safeguarding policy is available publicly and parents/those with parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school/college/home in this.
- Understands the relevant data protection legislation and regulations, especially The Data Protection Act 2018.

8.5. **The role of DSL – KCSiE2020:** DSLs need to take into account the learning from the following review: Help, protection, education: concluding the Children in Need review June 2019 [available here](#).

8.6. **Designated Deputy** - there are arrangements for covering the role of the Designated Safeguarding Lead when Sarah Stacey is unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team lead by a DSL with a number of deputies. Our Designated Deputies are Graham Everitt, Stephen Doughty, Carey Chandler and Lee Herring

**For all Key Contacts for [school/college/home name] – see appendix 7, this includes: DSL, Head Teacher, LADO and other.**

- 8.7. All staff are required to be aware of and alert to the signs of abuse and neglect. All cases of suspected abuse and neglect should be given the highest priority.
- 8.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and Safeguarding at Cambian**.
- 8.9. The contents and detail of this document are covered in induction and training programmes and all staff are required to follow the procedures at all times. DSL training and renewal training will be updated every two years.
- 8.10. All staff must update their basic awareness training at least annually by completing the 'Safeguarding Adults and Children – E-Learning' module on Achieve.
- 8.11. Staff will not be allowed to work with Individuals unless they have completed basic awareness training in child protection and safeguarding. The school must check that supply/agency staff have completed basic awareness training before being allowed into contact with Individuals.
- 8.12. Contractors and others on site who might have unsupervised access to Individuals must also complete basic awareness training before being allowed to start work.
- 8.13. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps to be followed when dealing with:
  - Allegations of abuse
  - Allegations made by Individual against staff

- Suspected physical injury or neglect
- Incidents: Consistent explanation or minor accidents

8.14. Staff must use the correct forms (as set out in this policy) when recording and managing concerns and allegations regarding the abuse of individuals.

#### Duties as an employer and an employee - amended LADO referral criteria (KCSIE2020)

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

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

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

#### Children potentially at greater risk of harm

8.17. Many children and young people in our services (Education and care) organisation have an allocated social worker (Child in Need and Child Protection Plans) due to safeguarding or welfare needs.

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

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

8.20. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

8.21. Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' [here](#) contains further information; the conclusion of the review, 'Help, protection, education' [here](#) sets out action Government is taking to support this.

#### Unexplained body marks

8.22. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises, swellings, cuts and scratches which by and large will be as a result of daily activities or for some Individuals as a result of self-injurious behaviour. However, all marks or physical changes must be recorded appropriately using (number to be added) weekly body chart. A **25.04 Concern form** MUST be completed for all unexplained marks and physical changes and passed to the DSL along with copies of the last 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always be kept informed. Concern log should be updated with concern and relevant reference number provided to concern.

- 8.23. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the correct course of action for dealing with unexplained body marks.
- 8.24. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no reasonable explanation can be given the DSL must contact the LSCP/ LADO/SAB/POVA for further advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.
- 8.25. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be opened and safeguarding process followed.
- 8.26. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome must be shared with social worker and parents.

#### A disclosure from an Individual

- 8.27. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart procedure.**
- 8.28. Reports of sexual violence and sexual harassment between children and young people are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education and care is not disrupted. It is also important that other children, young people and staff are supported and protected as appropriate.
- 8.29. **Listen** to what they have to say and take them seriously. Reassure them but do not promise to keep it a secret. The child/young person 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**.
- 8.30. **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 on MyConcern.
- 8.31. In cases where either a child/young person informs the staff that an act of FGM – however described – has been carried out on her, or where the staff observes physical signs on a girl appearing to show that an act of FGM has been carried out these situations, the DSL must be informed, who will trigger child protection/safeguarding procedures described in this policy and contact the Police. If a child/young person is at immediate risk – the Police (999) must be contacted immediately. If a child/young person required medical attention follow steps identified in ‘**Setting priorities**’ section 7.11 below.
- 8.32. Remember, **do not**:
  - Investigate the incident
  - Ask leading questions
  - Get the young person to repeat the disclosure over and over
  - Make assumptions or offer alternative explanations
  - Approach/inform the alleged abuser
- 8.33. Notify the DSL and log the concern on MyConcern within one hour or as soon as is possible. If the DSL is unavailable, pass it on to Deputy DSL. They will determine whether the matter is a child protection/safeguarding matter or a more general concern DSL will follow process described in **Appendix 8. DSL/Registered Manager (RM) – actions, reporting and recording procedure.**
- 8.34. All staff know that they can contact the Local Authority direct should that be necessary. Where a safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt with by the local Safeguarding Adult Board.
- 8.35. Any allegation against a staff member must also be reported to the Head Teacher. However, if the allegation is about the Head Teacher (who is not the Regional Manager/Lead) or DSL, then the relevant Regional Manager/Lead and Operations Director must also be informed, specific arrangements have been explored further in section 7.28-7.31.

- 8.36. Where contact is made with the Local Authority in which Cambian Bletchley Park School is geographically located, contact will also be made with the individual's own Local Authority and also their social worker. This will be completed by one of the members of school/college/home safeguarding team, Regional Lead/Manager or Operations Director – should an allegation against the Head Teacher or DSL have been made.
- 8.37. In the case of serious harm, and/or the Individual is in Immediate danger the local Police should be informed immediately as well and they can take immediate protective action as necessary.
- 8.38. 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/CIW/Estyn, the local safeguarding boards, the police or the **Whistleblowing Hotline – on 0800 1114298**.

### Setting priorities

- 8.39. The priority, at all stages throughout the child protection or safeguarding process, is the interests and safety of the individual.
- 8.40. Where appropriate, any concerns will be discussed with the Individual's family / carers and where possible their agreement will be sought to making a referral to the Local Authority. However, where there is a conflict of interests between the Individual and parent/guardian, the interests of the Individual must take priority and Cambian Bletchley Park School the right to contact the Individual's local authority, Social Care or the Police, without notifying parents/carers if this is in their best interests.
- 8.41. If an urgent medical attention or advice is required and GP/speciality doctor is not available, staff **MUST** use the NHS **111** service. NHS **111** is available 24 hours a day, 7 days a week.
- 8.42. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance. Alternatively, if it's assessed to be in the best interest of the child/young person - the DSL **MUST** take the Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local Authority/Police, remembering that every reasonable effort should be made to inform the parents/carers as soon as possible.
- 8.43. If the suspected abuse is sexual, then the medical professional must determine if the medical examination should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility that the needs of the young person are such that medical attention is the priority, in such case medical professional's judgment must be followed. There must at all times be a responsible adult with the individual whether from the Individual's care home/school/college, the Local Authority or the Police, if the parents/carers are not included. This section must be read in conjunction with our **0.29. Child Sexual Exploitation policy**.
- 8.44. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak for themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA. Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

### Carrying child protection examinations – professionals including medical professionals

- 8.45. A child protection examination is carried out to look for signs that a child or young person has been abused or neglected. Doctors **MUST** follow **0-18 yes – guidance** for all doctors provided by General Medical Council. This guidance is for all doctors, but it may also be useful for children, young people, those with an interest in their care including staff, and anyone else who wants to know what guidance doctors are given:

[https://www.gmc-uk.org/-/media/documents/0\\_18\\_years\\_english\\_0418pdf\\_48903188.pdf](https://www.gmc-uk.org/-/media/documents/0_18_years_english_0418pdf_48903188.pdf) (English version)

[https://www.gmc-uk.org/-/media/documents/0-18-years---welsh-1015\\_pdf-49302543.pdf](https://www.gmc-uk.org/-/media/documents/0-18-years---welsh-1015_pdf-49302543.pdf) (Welsh version)

- 8.46. All professionals should seek consent where an individual may not expect their information to be passed on. When they gain consent to share information, it must be explicit e.g. written statement, and freely given e.g. providing individual with sufficient and appropriate information in order for them to make an informed choice about what is being proposed.
- 8.47. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent e.g. they are afraid of the person who is abusing them, or because they are under pressure to



refuse, or due to lack of mental capacity (decision – specific). Doctors must inform their local authority children’s services, or the police, promptly if they are concerned that a child or young person is at risk of, or is suffering, abuse or neglect unless it is not in their best interests to do so.

- 8.48. If a child or young person refuses, or their parents refuse, to give their consent to a child protection examination that staff believe is necessary, and staff believe that the child or young person is at immediate risk of harm, DSL should contact the police and local authority children’s services, which may take emergency action to protect them.

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

- 8.49. All Individuals involved, whether perpetrator or victim, are treated as being ‘at risk’. The procedures for dealing with such abuse will be followed, where there is ‘reasonable cause to suspect that an Individual is suffering or likely to suffer significant harm’. DSL will refer peer on peer abuse to an LSCP/LSAB/POVA where there is a risk of significant harm. The DSL will report to the local Authority as above. Please see Peer on Peer abuse section under **section 6. High Risk Emerging Safeguarding issues** section.
- 8.50. Reports of sexual violence and sexual harassment between children and young people are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education and care is not disrupted. It is also important that other children, young people and staff are supported and protected as appropriate.

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

- 8.51. If we were given information that suggested that someone who does not reside at or attends our location has been abused by one of our members of staff, the DSL would immediately report this to the Local Authority and LADO. The Head Teacher must be kept informed. Should the staff member be involved we would then formally advise the member of staff of the allegation, making it clear that we would not play any part in the investigatory process. The employee would be advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived risks) etc. in exactly the same way as if the allegation had involved an Individual at our home/school/college. If the allegation is subsequently proved to be unfounded, he or she would be given full support in resuming their career.

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

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

#### **Allegations against staff**

- 8.53. All allegations must be reported to the Head Teacher, Laura Sharman or in their absence to DSL Sarah Stacey – see your local Safeguarding poster.
- 8.54. When an allegation is made against a member of staff, set procedures must be followed, see the flow chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart)**.
- 8.55. Staff MUST act on every allegation, all repeated allegations must be treated as new and carefully assessed and investigated. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.
- 8.56. Staff should refer to the **25.08.Guidance for staff who have the allegation made against them** provided for what to do in the event an allegation is made against them.
- 8.57. Staff on school sites, and parents are reminded that the 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 - KCSiE2020

- 8.58. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. The KCSiE2020 guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, **including supply teachers** and volunteers 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 he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 8.59. The information above relate to members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred **to the police**. Historical allegations of abuse should also be referred to the police.

## Allegations against Supply Teachers – KCSiE2020

- 8.60. The safer recruitment section and the managing allegations section in KCSiE2020, refers to the particular risks that may arise when employing supply teachers.
- 8.61. Where there is an allegation about a supply teacher (see KCSiE2020 paragraphs 213 – 217), the guidance says, 'Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. 'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome' (KCSiE2020 paragraph 215). DSLs must liaise with LADO before any decisions about ceasing the use of supply against whom allegations have been made. Where allegations made against supply teacher have been passed to LADO, the MD of Education must also be notified.
- 8.62. 'The school or college will usually take the lead [in any investigation] because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.' (KCSiE2020 paragraph 216).

## Allegations against the DSL (Principal or Registered Manager)

- 8.63. All allegations must be reported to:
- Education division: Regional Education Lead Naseem Akhtar, unless within residential education Registered Manager is the DSL in which case the matter will be referred to the Principal.
- 8.64. Depending on the division and who is the service DSL, people notified of allegation made (see above) will then refer the matter to LADO and notify their line manager:
- Education division: Regional Education Lead Naseem Akhtar] or
  - Managing Director for Education Andrew Sutherland. In Independent schools – the Proprietor must also be notified.
- 8.65. The person who referred the matter to LADO in line with agreed course of action will make a decision about who will lead the case including management investigation – should the allegation threshold be met.
- 8.66. In residential education associated with children's homes/care homes the Responsible/Nominated Individual MUST also be notified.

## Allegations against the Regional Manager

- 8.67. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral to LADO. Following this, the allegation should be passed to the identified senior person to follow through with LADO and subsequently act in line with agreed course of action. This means that the DSL will retain the

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

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

#### Allegations against the Managing Director

- 8.69. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral to LADO. Following this, the allegation should be passed to the identified senior person to follow through with LADO and subsequently act in line with agreed course of action. This means that the DSL will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 8.70. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the matter to LADO and act in line with agreed course of action.

#### Allegations against any other Senior Leader

- 8.71. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral to LADO. Following this, the allegation should be passed to the identified senior person to follow through with LADO and subsequently act in line with agreed course of action. This means that the DSL will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 8.72. Allegations not linked to specific site must be reported to the person's (whom allegation is made against) line manager who will refer the matter to LADO and act in line with agreed course of action.

#### Allegations against the Chief Operating Officer

- 8.73. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral to LADO. Following this, the allegation should be passed to the identified senior person to follow through with LADO and subsequently act in line with agreed course of action. This means that the DSL will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 8.74. Allegations not linked to specific site must be reported to the Chair of the Care Governance Committee - Moira Livingstone - who will refer the matter to LADO and act in line with agreed course of action.

#### Allegations against the Chief Executive Officer

- 8.75. Any allegations linked to the site, must be reported to the DSL of the site who will make the initial referral to LADO. Following this, the allegation should be passed to the identified senior person to follow through with LADO and subsequently act in line with agreed course of action. This means that the DSL will retain the responsibility to report the initial concern, but will have no further part in the process regarding gathering any information or, should it be required, in the actual investigation in relation to a senior member.
- 8.76. Allegations not linked to specific site must be reported to the Chair of the Care Governance Committee - Moira Livingstone who will refer the matter to LADO and act in line with agreed course of action.

#### Serious incident reporting

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

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

- 8.78. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the rapid response process described below:
- **Call the Ambulance and Police**

- Unless the 999 operator tells you to, do not touch the person, do not move anything around them which may form part of forensic evidence. Police will make a decision about the forensic examinations and appropriate security of the scene.
- DSL will contact Local Safeguarding Children Partnership/MASH/Local Safeguarding Adults Board and follow the Serious Untoward Incidents (SUI) reporting procedure.
- DSL will contact Children's/Adults Social Care Team
- Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services (CAMHS) should also be notified by MASH/Children's Social Care.

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

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

- Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager following the **35.01. Caretech Children's services SUI process.**
- Next of kin/parents/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, CIW, Estyn
- Ministry of justice if applicable.
- The placing authority/authorities.
- The local authority responsible for Social Services and Education (where the death takes place in a registered school) within whose area the education location is situated.
- The District Health Authority within whose area the education location is situated.
- The Department for Education, (where the death takes place in a registered school).
- The Health and Safety Executive.

#### Abuse of position of trust

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

#### Visitors

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

#### Volunteers

8.83. 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

8.84. 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

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

- 8.86. 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

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

### Photography and images

- 8.90. This section should be read in conjunction to our **GIG 02. Data Protection policy**.
- 8.91. The vast majority of people who take or view photographs or videos of Individuals do so for entirely innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through taking or using images, so we have some safeguards in place.
- 8.92. To protect our children, young people or young adults we will:
- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
  - seek parental consent of consent from the Individual
  - not use their full name with an image, only their initials
  - ensure that personal data is not shared
  - store images appropriately, securely and for no longer than necessary
  - only use school equipment, i.e. not personal devices
  - encourage our children, young people and adults to tell us if they are worried about any photographs that are taken of them

### Physical intervention and use of reasonable force

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

### Staff Taking Medication or other substances

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

### Information for individuals and relatives/carers

- 8.96. 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.
- 8.97. They will also be advised that they can nominate an advocate or representative to speak and act on their behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be appointed. They will be advised of rights to legal aid in where appropriate to victim support and compensation.

### Recruitment and vetting

- 8.98. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2. Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct Certificates.
- 8.99. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply teaching and teacher trainees, agency care staff as well as all members of the proprietor body. This is regularly audited.
- 8.100. For agency workers we obtain written confirmation that all checks have been completed, in line with safer recruitment, from the employment business that is supplying the member of agency staff. All Locations must ensure that 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.
- 8.101. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the agency.
- 8.102. 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)

- 8.103. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one month after leaving the Location) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.
- 8.104. Referrals to the Disclosure and Barring Service will be made for any person (whether employed, contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she is considered unsuitable to work with children and young people.
- 8.105. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is provided at paragraph 179.

### Record-keeping

- 8.106. 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 on MyConcern.
- 8.107. Records should be factual, accurate, concise, ethical and relevant.
- 8.108. All recording of written information should be legible and discussions with other professionals and agencies should be recorded chronologically.
- 8.109. There will be a safeguarding section/folder for each Individual which will hold any concerns/safeguarding documentation for that individual. At the front of each folder there is an Index for Individual's Concerns. This is to enable the location to keep accurate records of any concerns raised regarding the individual and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure location.
- 8.110. Each location will also maintain **25.07. Central Log of Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information where the concern has escalated. Where this is held as a paper version this is to be made into a bound booklet and completed by the 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

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

## Training

- 8.112. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction introduces the new staff member to the policy, procedure and practice at the location. They will also be orientated 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.
- 8.113. All staff MUST complete mandatory safeguarding face to face or online training via the company's 'Achieve' training platform. 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 MUST be recorded on Achieve. In addition to this safeguarding workshops are provided both by internal trainers and by external companies as required.
- 8.114. DSLs and Deputies DSLs attend safeguarding training every two years with their own local authority. Where a local authority does not provide this training the staff member will attend training in line with the local authority guidance. This training must be updated annually
- 8.115. We provide role-appropriate and refresher training to all staff including those specific to the role of DSL and Deputy DSL, in accordance with Milton Keynes procedures and KCSIE (2020). We consult with Milton Keynes Safeguarding Children's/Adult'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 all types of abuse in relation to children and young adults.

## Ofsted Inspection

- 8.116. Since September 2019, Ofsted's inspections of early years, schools and post-16 provision are carried out under: Ofsted's Education Inspection Framework [here](#). Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.
- 8.117. In addition to the framework and inspections handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: Inspecting safeguarding in early years, education and skills settings [here](#).
- 8.118. The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools, and will also report on safeguarding arrangements. ISI has a published framework which informs how it inspects at Independent Schools Inspectorate [here](#).

## Confidentiality and information sharing

- 8.119. Information sharing is vital in identifying and tackling all forms of abuse and neglect. Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children/ young people whether this is when problems are first emerging, or where a child is already known to local authority children's social care.
- 8.120. Exchange or disclose of personal information with other agencies will be completed in accordance with **GIG 02. Data Protection and GIG 09. Confidentiality** and all relevant legislation including the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.



8.121. 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.

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

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

8.123. When sharing safeguarding information regarding an individual, staff will need to 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
- 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.

8.124. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

8.125. Further details on information sharing can be found:

- in Chapter one of Working Together to Safeguard Children [here](#), which includes a myth-busting guide to information sharing
- at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers [here](#). The seven golden rules for sharing information will be especially useful
- at The Information Commissioner's Office (ICO) [here](#), which includes ICO GDPR FAQs and guidance from the department
- in Data protection: toolkit for schools [here](#)- Guidance to support schools with data protection activity, including compliance with the GDPR.

8.126. 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".*



8.127. 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 Sarah Longley-Cook.

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

## Complaints and Monitoring

8.129. All complaints arising from the operation of this policy will be considered under the **0.22 complaints procedure**, with reference to the our Designated Safeguarding Officer who is Sarah Stacey (DSL) and Milton Keynes Safeguarding Children's Board

## 9. Accountability

- 9.1. Sarah Stacey is the Designated Safeguarding Lead (DSL) at Cambian Bletchley Park 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 Cambian Bletchley Park School will follow the procedures outlined in this policy.
- 9.2. The content and effective implementation of policy and procedures are subject to routine monitoring by the Head Teacher. Our Operations Director, John Ivers will undertake a full annual review of the content and effective application of this policy and associated procedures. The date for the next scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in legislation, regulatory requirements or as a result of best practice guidance.
- 9.3. Cambian's Chief Operating Officer (COO) is the company's Safeguarding Lead. COO will support and promote the development of initiatives to improve the prevention, identification and response to abuse and neglect. He is the Director accountable for safeguarding is responsible for reporting on safeguarding and providing executive leadership. He is accountable for the governance of safeguarding.
- 9.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can be stressful and distressing for staff.
- 9.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors, allied health professionals and nurses) should understand how their professional standards and requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.
- 9.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level need to share a common view of what types of behaviour may be abuse or neglect and what should be an initial response to suspicion or allegation of abuse or neglect.
- 9.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies which define the local practice that must be followed.
- 9.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact names and details if required.

## Appendix 1: Relevant policies and documents

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

12. Capacity to consent
13. Prevent
14. Recruitment
15. Code of Conduct
16. Data Protection
17. Confidentiality
18. E- safety
19. Disciplinary
20. Complaints
21. Staff code of conduct
22. Mobile telephony
23. SUI Caretech children's services process

## Appendix 2: Legislation and guidance

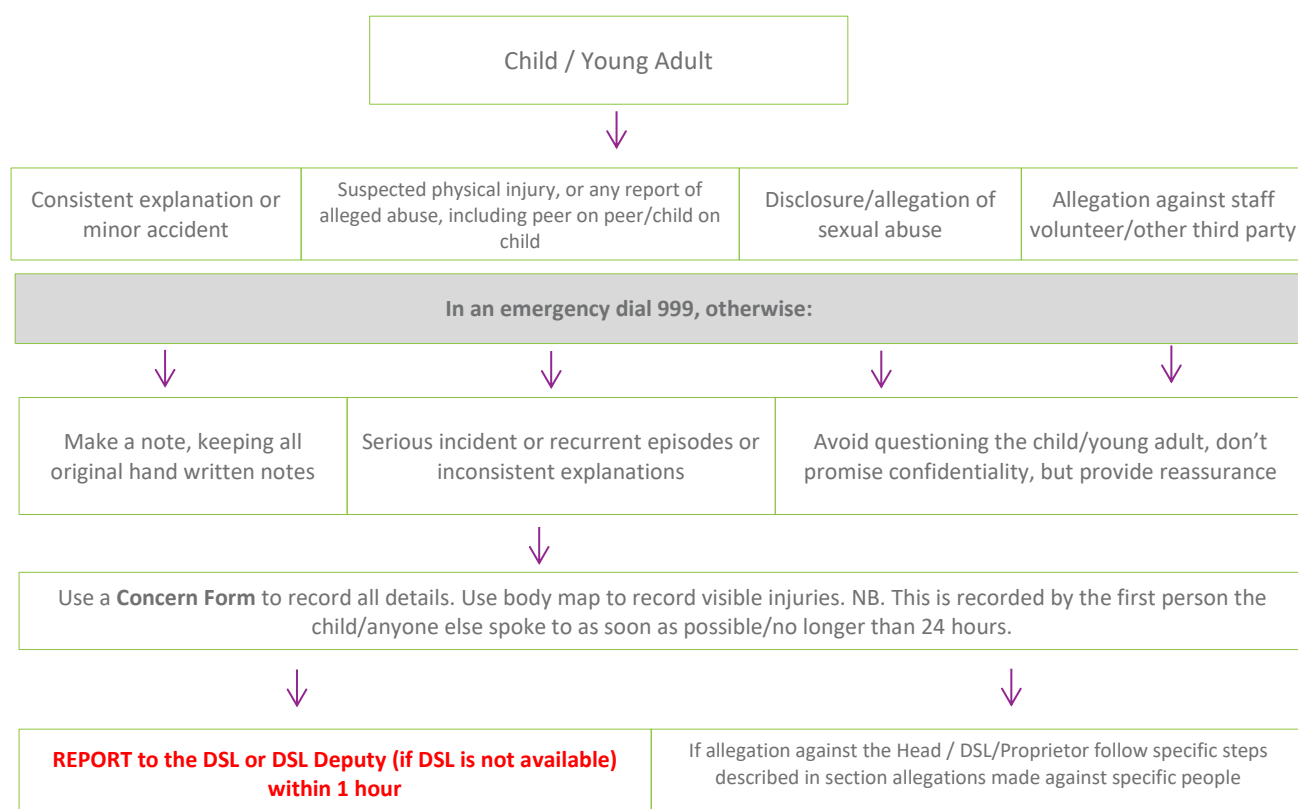
- The Children Act 2004, as amended by the Children and Social Work Act 2017
- Statutory Instrument 2015 No.541 Social Care, England The Young people's/care home Homes (England) Regulations 2015 in force as of 1st April 2015
- Guide to the Young people's/care home Homes Regulations including the Quality Standards (DfE: April 2015)
- This policy is also in accordance with the Local Safeguarding Young people Board (LSCP) 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.
- All Wales Child Protection Procedures 2008
- All Wales POVA Guidance 2008
- Keep learners Safe 2015
- The Care Act 2014
- Social services and wellbeing Act 2014
- [Working Together to Safeguard Children 2018](#)

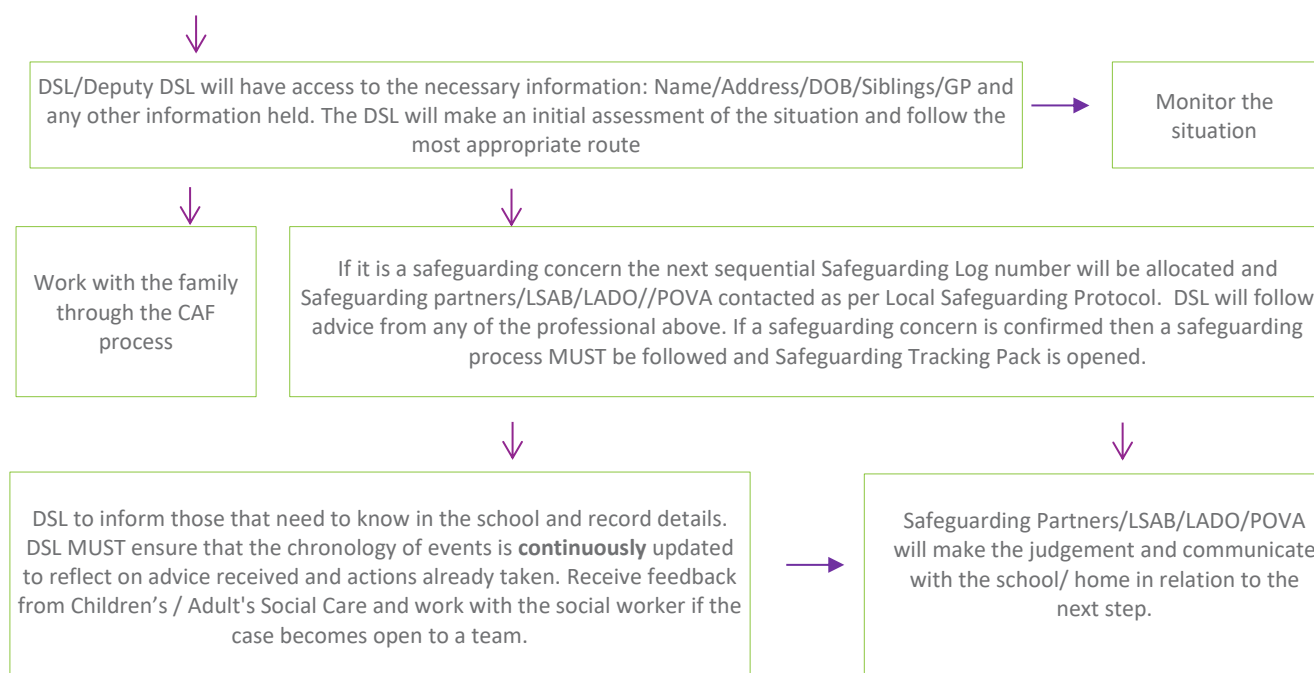
- Keeping children safe in Education 2020
- Keeping children safe in education - part one 2020
- [What to do if you're worried a child is being abused](#)
- [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/667862/Sexual\\_Harassment\\_and\\_Sexual\\_Violence\\_-\\_Advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/667862/Sexual_Harassment_and_Sexual_Violence_-_Advice.pdf)
- <https://www.gov.uk/government/policies/violence-against-women-and-girls>
- <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>
- [Teaching online safety in school.pdf](#)

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

DSL – Designated Safeguarding Lead  
CAF – Common Assessment framework

CSC– Children’s Social Care  
LADO – Local Authority Designated Officer





#### Appendix 4: Types of abuse – children

- **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.



## Appendix 5: Types of abuse - adults

- **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling, scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding or withholding food, unauthorized restraint, restricting movement.
- **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the honour of the family and/or the community including female genital mutilation (FGM), forced marriage and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be handled and escalated as such. Professionals in all agencies, individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence and abuse 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.
- **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.
- **Sexual harassment**- unwanted conducts of a sexual nature that can occur online and offline, sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment.
- **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing services, educational and social opportunities and seeing friends, removing mobility or communication aids or intentionally leaving someone unattended when they need assistance, preventing someone from meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a patronising or infantilising way, threats of harm or abandonment, cyber bullying.

- **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from accessing their own money, benefits or assets, employees taking a loan from a person using the service, undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions, arranging less care than is needed to save money to maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in a family home, someone moving into a person's home and living rent free without agreement or under duress, false representation, using another person's bank account, cards or documents, exploitation of a person's money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy, 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 for self-neglect are usually more appropriate under the parts of the Care Act dealing with assessment, planning, information and advice, and prevention.

There are additional references to **transphobic, homophobic and disablist** bullying in **Peer on peer abuse and sexual violence and harassment** section.

## Appendix 6: Signs that someone could be a victim

### Physical abuse

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

### Sexual abuse

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

### Psychological or emotional abuse

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

### Neglect and acts of omission

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- A build-up of medication that hasn't been taken
- Uncharacteristic failure to engage in social interaction
- Unsuitable clothing or not enough clothes

#### Appendix 7: Signs that someone could be an abuser

- Using restraint when it's not needed
- Having favourites
- Giving treats, presents or money to certain people without permission from a manager
- Finding ways to spend time with a particular child, young person or young adult, perhaps by working longer hours or giving up free time
- Finding ways to spend time alone with a particular child, young person or young adult , for example in a car or somewhere else
- Inviting a particular child, young person or young adult at risk to their own house without permission from a manager
- Being over-friendly with a child, young person or young adult's parents or guardians without permission from a manager
- Taking photos of the child, young person or young adult that aren't for work purposes
- Trying to make private contact with a particular child, young person or young adult , including by text, email, mobile phone, online or in letter
- Finding ways to have physical contact, like play-fighting or tickling
- Keeping collections of toys or other items that might attract children or people at risk

## Appendix 8: DSL/Registered Manager (RM) – actions, reporting and recording procedure

- The DSL/RM receives a completed concern on MyConcern from a member of staff.
- DSL/RM enters the concern details on the **25.07. 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 (children and adults) matter the DSL/RM will then also additionally allocate the next sequential Safeguarding Reference number on the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and immediately (or at least within one hour of receiving the concern form, make a referral to the Local Authority Designated Officer (LADO) and LSCP to discuss the allegation and agree a course of action.
- If the LADO 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 MyConcern record and on the Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Review Practice/No Further Investigation. The Head Teacher, DSL/RM MUST ensure the practice is reviewed by relevant practitioners within the provision - this may include the whole multidisciplinary team or particular member/s of it. The review must be recorded and outcomes shared with the people involved. Feedback from the review session MUST be provided to LADO
- 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 LADO for any matter which is deemed by the DSL to be of concern and has been raised with the LADO.
- If the LADO confirms that the matter is a safeguarding concern and that it requires investigation either at local or external level then a **25.05 Safeguarding Tracking pack** must be opened with the next sequential Safeguarding Reference included on the form and details as such entered on the central log.
- Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the **Responsible/Nominated Individual and Regional Education Manager in day schools** as a follow up to the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual and Regional Education Manager in day schools** on completion, providing detailed overview of the actions taken and the final outcome. The **Responsible/Nominated Individual and Regional Education Manager in day schools** will update relevant Directors accordingly. This original form must be kept in the Safeguarding file.
- In the case of serious harm, and/or the child/young person or young adult is in immediate danger the local Police should be informed immediately as well and they can take immediate protective action as necessary.
- If the matter is a more general concern then ensure that the 'Action Taken' log on the concern form is completed and the form is filed within the Safeguarding file. Either way the form must be signed by the DSL/RM.
- The relevant concern form should be referenced in the Individual's **25.01 Index form for Individual concern/safeguarding file** and the site's **25.07 Central Log of Concerns and Safeguarding**.
- All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack**.
- The Safeguarding Concern will remain open until LADO have confirmed in writing that the concern is closed and Responsible/Nominated Individual and Regional Education Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off have been completed. Once the Safeguarding tracking Pack is signed, it MUST be filed in the Safeguarding file.**
- If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local Authority and/or the police. The individual can be kept in their care home or on the school/college site fully supported (e.g. if they are a day student) if advised to do so by these

- The parent/carers should be informed and a decision should be made with the Local Authority and the Police about who should do what.
- If the DSL/RM feels unsure about what the Individual has said or what has been said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse referral but may help to clarify the situation but they must record all details of any conversation and advice received on a concern form. He/she can then move to a formal referral or actively monitor the situation.
- The LADO will oversee any subsequent investigation of any suspicion or allegation of abuse directed against anyone working within the establishment. The establishment MUST not internally investigate any allegations of abuse without first taking instruction from the LADO.
- Once agreed by LADO that the provider can commence the internal investigation (level 2), the investigation process will commence.
- Once agreed by LADO that the investigation will be completed by the external agency (level 3), where required, Head Teacher, DSL/Registered Manager will take appropriate steps to assist the external agency to ensure the investigation is completed.
- Registered Manager MUST notify relevant regulator (Ofsted/CQC/CIW/Estyn) by submitting specific notification document within the time frame specified by their regulator. This is regardless of who leads on the investigation and whether or not the investigation has been concluded.
- If as the result of an investigation there has been a substantiated allegation against a member of staff, we will work with the 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. Also we will work with our internal Human Resources department and may commence proceedings under **GHR 27. Disciplinary policy and procedure.**
- We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police. Records are kept of all conversations as part of the investigation process and made available as required.



## Appendix 9: Key contacts

**The Designated Safeguarding Lead (DSL)** is Sarah Stacey

Telephone (24 hrs) 07876 791949 Email: [Sarah.Stacey@cambianguroup.com](mailto:Sarah.Stacey@cambianguroup.com)

**The Deputy Designated Safeguarding Lead** is Graham Everitt

Telephone 01908 048380 Email: [Graham.Everitt@cambianguroup.com](mailto:Graham.Everitt@cambianguroup.com)

**The Headteacher** is Laura Sharman

Telephone (24hrs) 07860 189713 Email: [Laura.Sharman@cambianguroup.com](mailto:Laura.Sharman@cambianguroup.com)

**Operations Director** is John Ivers

Telephone (24hrs) Email: [john.ivers@cambianguroup.com](mailto:john.ivers@cambianguroup.com)

## Directorate (Education or Residential Services)

### Group

The Proprietor of the Young people's/care home is The Cambian Group. The Proprietor's representative is John Ivers (COO Children's Services) whose contact details are above.

## Local authority / Local Safeguarding Children Partners/ Local Safeguarding Adult's Board

Milton Keynes Local Authority & Milton Keynes Safeguarding Children's Board

Milton Keynes Local Authority & Milton Keynes Local Safeguarding Adults' Board

Telephone 01908 253169/3170

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

Outside of office hours 01908 265545

Thames Valley police - The non-emergency police telephone number is: 111.

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

The Local Authority Designated Officer (LADO) is Jo Clifford

Telephone: 01908 254300

Outside of office hours/weekends, the emergency duty team can be contacted on: 01908 265545

## Appendix 10: Knife crime – safeguarding children and young people

- Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#)  
In this report, when it refers to knife crime, these are references to both; to the use of knives against children either to threaten or to wound them and to instances when children may have been carrying or using knives for a range of purposes.
- Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife-carrying. However, there are many different criminal offences relating to knives. For example:
  - it is an offence to threaten or cause harm to a person with a bladed weapon
  - some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18
  - offences such as robbery or assault can be aggravated if a knife is involved
  - it is also an offence to carry a knife in a public place without good reason.
- It is clear that knife crime is an increasing safeguarding risk to children and young people, both at school and in their local communities. While Ofsted have not sought to answer the question of the causes of knife crime, leaders told Ofsted that, in their experience, children are in three categories of risk of knife-carrying:
  - The highest level of risk is for those children who have been groomed into gangs, for the purposes of criminal exploitation.
  - Underneath this lies a group of children who have witnessed other children carrying knives, have been the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on social media.
  - Then there are children who carry knives to school as an isolated incident. For example, they may carry a penknife that a grandparent has gifted them.
- It is important to remember that knife crime does not exist in a vacuum and children who are victims or perpetrators may also be experiencing multiple vulnerabilities.

<https://adcs.org.uk/safeguarding/article/new-paper-on-serious-youth-violence-and-knife-crime>

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

<https://www.bbc.co.uk/news/uk-48176397>

- In 2018 knife crime reached a record level in England and Wales with 40,829 offences involving knives or sharp objects recorded by police in 2018.
- The All-Party Parliamentary Group on Knife Crime (APPG) studied budgets for youth services from 2014/15 to 2017/18. It also analysed knife crime data. It said the four areas worst-hit by youth spending cuts also saw some of the biggest knife crime rises. Although it is not possible to directly compare the geographical areas covered by police forces and local authority boundaries, the APPG analysis suggests forces serving areas with the biggest cuts, such as West Midlands Police, the Metropolitan Police, Cambridgeshire Police, and Thames Valley Police,

have also seen some of the highest increases in knife crime. West Midlands Police has seen an 87% increase in knife crime offences since 2013/14, while there has been a 47% rise for the Metropolitan Police, a 95% increase for Cambridgeshire Police, and a 99% increase for Thames Valley.

## Appendix 11. Child protection and safeguarding during Coronavirus

Please read this appendix in conjunction with DfE: Coronavirus (COVID-19): safeguarding in schools, colleges and other providers [here](#).

### 1. Safeguarding Training and induction

- Any new DSL training is very unlikely to take place during this period.
- For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.
- All existing services (school/colleges/care homes/children's homes) staff have had safeguarding training.
- All staff within Cambian children's Services have read 025. Child Protection and safeguarding policy. Staff working in children's residential care have also read Working Together to Safeguarding Children 2018 and those working within education (including residential education) have read part 1 of Keeping Children Safe in Education (2020).
- The Designated Safeguarding Lead should communicate with staff any new or adjusted local arrangements, so the staff know what to do if they are worried about a young person.

### 2. DSL in self isolation or part of shielded group but still working remotely

- Where DSL is in self isolation or it is part of shielded group but still working remotely arrangements must be put in place to ensure DSL deputy (deputies) cooperate with DSL who may still be able to remotely review any concerns being reported and liaise with LADO/LSCP/SAB/POVA. In those cases the Working remotely policy must be followed.

### 3. DSL not working – the role of DSL Deputy Kee

- Where DSL is currently not working because they are unwell or due to another reason, arrangements must be put in place to ensure DSL deputy (deputies) step in and deputise as per 025. Child Protection and safeguarding policy with the due process being followed.
- Where new staff are recruited, or staff from other services within Cambian or Caretech enter the service to provide care and support, they will continue to be provided with a safeguarding induction.

### 4. The minimum information staff must be given

- The existing workforce may move between services on a temporary basis in response to COVID-19.
- Where service receive staff from another service within Cambian or Caretech, the Head Teacher together with the DSL will judge, on a case-by-case basis, the level of safeguarding induction required. As a minimum, the staff will be provided with a copy of 25.15 [the Guide to Child Protection and Safeguarding](#), so they can fully understand what the child protection and safeguarding arrangements on that site are and also they will be given the name and contact details of the DSL and DSL deputy (deputies).
- All staff must be reminded how 025. Child Protection and safeguarding policy can be accessed.

### 5. New staff on site

- There might be staff who may be working in a new building and/or with new people and with young people they do not know, as they support vital work to provide childcare during the coronavirus outbreak.
- It is important that while people from different agencies and settings work together, everyone has the same information about what to do if they are worried that a young person may be at risk of harm, abuse or neglect – [see section on minimum information staff must be given](#).

### 6. Checking that staff understand their safeguarding role

- During this time some staff on site will be experienced in responding to safeguarding concerns, but some may be less confident about how to respond under new working arrangements, so it is vitally important **all staff** including bank and agency worker are reminded of the local child protection and safeguarding arrangements and who DSL and DSL deputy (deputies) are.
- Staff are reminded of the need to report any concerns without delay.

### 7. Recruitment processes

- During Covid-19 Cambian's children services will follow the revised recruitment processes, an overview of which is available via Recruitment Team and Managing Directors.
- It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to young people. When recruiting new staff, services will continue to follow the relevant safer recruitment processes for their setting.
- Where Head Teacher is not sure or have concerns about a potential candidate they must contact their Resourcing Business Partner for the region and, where appropriate, HR Business Partner for guidance before any decisions are made.
- If staff are deployed from another Cambian or Caretech (Children's Services) setting, the Head Teacher will confirm in writing that:
  - the individual has been subject to an enhanced DBS and children's/adults (where relevant) barred list check
  - there are no known concerns about the individual's suitability to work with children (or adults at risk, where relevant)
  - there is no ongoing disciplinary investigation relating to that individual

#### 8. DBS requirements

- Services will continue to comply with the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.
- Schools/Colleges will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct: advice for making a referral'.
- During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk).
- Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that services are aware, on any given day, which staff/workers will be in and that appropriate checks have been carried out, especially for anyone engaging in regulated activity.
- Schools/colleges - as such, school name will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

#### 9. Behaviour support and restraint/physical intervention training

- Services will continue following their Behaviour Support policy. The training on the non – Restraint/Physical Intervention (RPI), behaviour management with a focus on de-escalation would continue to be delivered remotely.
- There might be particular scenarios where services will have to assess the situation and consider the need for localised face to face training for example:
  - New placement (referral documentation) needs cannot be met by capability of existing team or existing young person's Behaviour Management Plan highlights elevated risks, increasing likelihood of RPI being required to support behaviour and/or
  - Due to staffing availability, staffing ratio of RPI trained : RPI untrained staff becomes a risk

#### 10. In relation to point 9 above, the following steps will need to be taken to reduce/eliminate the risk at site:

- a) Untrained staff briefed fully on updated Behaviour Support Plans and Individual Risk Assessments/Behaviour Management Plans and actions to be taken in the event that de-escalation is not sufficient during an incident,
- b) Staffing rota reviewed (where possible) and amended to minimise exposure of untrained staff with relevant young people who may require RPI,
- c) Additional trained staff temporarily sourced to support site for a limited period,
- d) Untrained staff redeployed to another site with no/minimal history of RPI, and replaced with trained and experienced staff

#### 11. In relation to point 10 above, if a - d have been implemented and the risk is not sufficiently mitigated such that there is a safeguarding risk / placement at risk, then:

- e) Request made by MD to COO John Ivers, setting out action taken (see a-d above) and details of training needed. Decision documented by COO John Ivers as SRO.



- f) Subject to approval, request then made to Nigel Taylor for training to be organised, depending upon capacity. Details of training discussed directly with L&D team.

#### 12. Online safety in our services

- Services will continue to provide a safe environment, including online. This includes the use of an online monitoring and filtering system.
- Where children are using computers in the homes, appropriate supervision will be in place.

#### 13. Children and online safety away from the service

- It is important that all staff who interact with young people, including online, continue to look out for signs a young person may be at risk. Any such concerns should be dealt with as per the child protection and safeguarding policy and where appropriate referrals should still be made to LADO/LCSP/SAB/POVA and as required the police.
- Where online teaching takes place this should follow the same principles as set out in the school's or college's staff code of conduct.
- Services will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.
- The government has published new advice to help people, particularly children, stay safe online during the coronavirus outbreak.
- With more people than ever working from home and many children using the internet for education and entertainment, there are increased risks of exposure to online harms such as cyberbullying and disinformation.

<https://www.gov.uk/guidance/covid-19-staying-safe-online>

#### 14. Visitors

- Each services must follow their current up to date visitors procedure which has been developed in response to Covid-19.

#### 15. Other policies and protocols

- Each service has access to Cambian Point and those working for Caretech to Rezone should they need access to a specific policy.
- There are also multiple COVID -19 specific information including up to date governments' guidance available on the organisation's Micro site <http://covid19.caretech-uk.com/> and Resource Hub <https://www.cambiagroup.com/covid-19> which have been uploaded in the following sections:
  - Covid19 information
  - Key information for your service
  - Guidance for staff
  - Wellbeing
  - Children
  - Adults
  - Fostering