

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

Cambian Wing College

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92 1. Monitoring and review

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

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

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

100 Signed:



Jeremy Wiles
Group Executive Director- Children's Services
Date: August 2021



Cassandra Pollitt
Headteacher
September 2021

101

102 2. Terminology

103 2.1. Our aim is to use consistent terminology throughout this policy and all supporting documentation as
104 follows:
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‘Establishment’ or ‘Location’	This is a generic term which means the Children’s Home/school/college.
Individual	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Cambian Wing College we have young people attending our college between the ages of 16-25.
Head of Service	This is the senior person with overall responsibility for the college. At Cambian Wing College this is the Headteacher, Cassandra Pollitt.
Key Worker	Members of staff that have special responsibility for Individuals residing at or attending the Establishment.
Parent, Carer, Guardian	Means parent or person with Parental Responsibility
Regulatory Authority	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
Social Worker	This means the worker allocated to the individual’s family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
Safeguarding Authority	Children’s Social Care, Safeguarding Partners, Local Safeguarding Adults Board [LSAB] - England, Regional Safeguarding Children’s Boards [RSCB] – Wales *whichever apply for the type of service and country
LADO	Local Authority Designated Officer
DSL/DSL Deputy	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
Placing Authority	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
Staff	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
CambianKPI	The online in-house information system which holds data for each site on quality measures.

112

113 3. Definitions and age related arrangements

114 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies
115 to children and young people until they reach the age of 18, Keeping Children Safe in Education (2021)
116 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)
117 Act 2021.

118 3.2. **Adults are over the age of 18.** Over 18 year olds are covered by the Local Safeguarding Adult Boards
119 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse
120 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and
121 as a result of their particular care and support needs, is unable to protect themselves from either the risk
122 of, or the experience of abuse or neglect’. We refer to adult service users in our provision as **young adults**
123 due to the fact we provide children’s services up to the age of 25.

124 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the
125 legal framework for social service provision in Wales. It sets out what must and should be done to

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

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

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

137 3.6. Where we make references to schools and colleges, this also includes associated children's or care homes
138 in which children/young people live. Where we make references to children's or care homes, those cover
139 all children's/care homes including those within the children's residential care division.
140

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

142 1.1. Children Social Care - provide support to children in need of help and protection, including children with
143 disabilities. Services include statutory assessment and care planning for children at risk of significant
144 harm, provision for cared for children and care experienced young people, as well as fostering and
145 adoption services.

146 3.7. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing
147 bodies and proprietors should ensure that the school or college contributes to multi-agency working in
148 line with statutory guidance [Working Together to Safeguard Children](#).

149 3.8. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area
150 within the local authority and the chief officer of police for an area (any part of which falls) within the
151 local authority area made arrangements to work together with appropriate relevant agencies to
152 safeguard and promote the welfare of local children, including identifying and responding to their needs.

153 3.9. It is especially important that schools and colleges understand their role in the three safeguarding partner
154 arrangements. Governing bodies, proprietors and their senior leadership teams, especially their DSLs,
155 should make themselves aware of and follow their local arrangements.

156 3.10. The three safeguarding partners should make arrangements to allow all schools and colleges in the local
157 area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally,
158 the three safeguarding partners will name schools and colleges as relevant agencies and will reach their

own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

Child protection definition

3.11. 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 safeguard 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 2021

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

3.14. 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.

Safeguarding Adults

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

3.16. 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

3.17. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and procedures which apply to its Adults' Services. Both policies can be accessed via Rezume. Services operating in Wales can find their Safeguarding Regional Boards via this hyperlink which provides access to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

The difference between safeguarding and child protection

3.18. 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

203 means everything from security of the buildings, to the safe recruitment of staff and everything in
204 between. **Appendix 10.** Illustrates Safeguarding in children's services.

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

206 3.19. In the context of a child/young person abuse and neglect are forms of maltreatment. Somebody may
207 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.
208 Children/young people may be abused in a family or in an institutional or community setting, by those
209 known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another
210 child/young person or children/young people.

211 3.20. Abuse could mean neglect, physical, emotional, sexual abuse, any other including combination of these.
212 The different types of abuse are explained in more detail in **Appendix 4 – Types of abuse - children.** The
213 signs that someone could be a victim or an abuser have been explored in **Appendix 6 and Appendix 7.**
214 Parents, carers and other people can harm children and young people by direct acts and/or failure to
215 provide proper care. It should also be understood that children can also be abused by being sexually
216 exploited, or subject to honour based abuse, domestic violence, forced marriage, female genital
217 mutilation and through online social media. See **Appendix 11 - Further safeguarding information – what**
218 **everyone need to know.**

219 3.21. In the context of an adult, abuse is a violation of a person's human and civil rights by another person or
220 persons and may result in significant harm to, or the exploitation of, the person subjected to it.

221 3.22. In addition to the types of abuse mentioned in **Appendix 4 – Types of abuse - Children,** there are other
222 forms of abuse in relation to adults explained in more detail in **Appendix 5 – Types of abuse – Adults.**

223 3.23. Abuse can happen anywhere: for example, in someone's own home, in a public place, in hospital, in a
224 care home, school or in a college. It can happen when someone lives alone or with others. Anyone can
225 carry out abuse or neglect. Abuse can be intentional or unintentional, it may be a single act or repeated
226 acts.

227 **4. Purpose**

228 4.1. As an organisation we have a clear set of guidelines to make sure we deal with child protection and
229 safeguarding concerns effectively.

230 4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance,** and it complies
231 with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information**
232 **Poster.** This policy complies with Bournemouth, Christchurch & Poole locally agreed procedures. Printed
233 or electronic copies of the Local Safeguarding Children's Partnerships (LSCP), Local Safeguarding Adults

234 Board (LSAB) or Regional Safeguarding Children's Boards (Wales) procedures are available in every
235 setting.

236 4.3. Policies and procedures for child protection and safeguarding must be undertaken in accordance with
237 the requirements of the local authority in which the establishment is situated.

238 4.4. This policy, and supporting information in various accessible forms, is made available to all Individuals,
239 staff and parents associated with Cambian Wing College to ensure that everyone is clear on procedures
240 for ensuring the protection of children and safeguarding children and young adults.

241 4.5. This policy and procedure must be read in conjunction with **GHR 30. Whistleblowing Policy** and **GHR 11.**
242 **Staff Code of Practice and GHR 37. Code of Conduct.**

243 4.6. In addition, staff should be aware of and have access to the **NSPCC whistle-blowing helpline number**
244 **0800 028 0285** and the Cambian Whistleblowing service operated by **EthicsPoint on 0800 086 9128**. More
245 information about EthicsPoint and how it can be contacted can be found in the Whistleblowing policy.

246 4.7. [‘When to call the police’](#) has been produced by the National Police Chiefs Council (NPCC) to support
247 school and college staff with when it is appropriate to contact the police.

248 4.8. This NPCC advice does not cover safeguarding incidents. Where a child is suffering, or is likely to suffer
249 from harm, it is important that a referral to children's social care (and if appropriate the police) is made
250 immediately. Referrals should follow the local referral process.

251 **5. Policy**

252 **Safeguarding culture of the organisation**

253 5.1. Cambian safeguarding culture can be best described as:

- 254 - **Proactive**, being professionally curious to determine further information in the interests of the child.
- 255 It is essential that staff exercise professional curiosity at all times as it is likely that signs of any form
- 256 of abuse including neglect will be identified when dealing with an un-associated incident. Having

- 257 strong governance and leadership, raising awareness through and enhancing children's and young
258 people's capacity around the risks and their own safety, regular reflective supervision).
- 259 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other professionals
260 in timely manner, active listening, applying theory in practice in a methodical way).
- 261 - **Reflective** (understanding 'how we got there in the first place', completing a reflective account of
262 events, involving other key professionals in future planning, identifying actions and further changes
263 to be made).
- 264 5.2. Child Protection and Safeguarding is everyone's responsibility. Everyone working for or visiting our
265 locations has a responsibility to understand and implement this policy and procedure at all times.
- 266 5.3. All Individuals in our services have a right to feel safe, secure and be protected from harm.
- 267 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all
268 Individuals with Special Educational Needs (SEN) and disabilities:
- 269 • Are more likely to be abused or neglected;
 - 270 • May display behaviour, mood and/or injury which may relate to possible abuse and not just their SEN
271 or a particular disability.
 - 272 • Have a higher risk of peer group isolation.
 - 273 • Can be disproportionately impacted by things like bullying without outwardly showing any signs.
 - 274 • Experience communication barriers and difficulties in overcoming these barriers.
- 275 5.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.
276 We will ensure all staff have the skills, knowledge and understanding to help keep children and young
277 people safe.
- 278 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or
279 disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care home
280 or in the community, taking into account contextual safeguarding, see **Appendix 11 - Further**
281 **safeguarding information – what everyone need to know** which also contains information related to
282 safeguarding issues related to individual children and young people's needs.
- 283 5.7. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding
284 of safeguarding, through both formal curriculum and informal opportunities.
- 285 5.8. As an organisation we acknowledge that working in partnership with other agencies protects Individuals
286 and reduces risk and so we will engage in partnership, working throughout the child protection process
287 to safeguard children and will equally work through safeguarding adults' procedures as directed by local
288 procedures.
- 289 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance
290 referred to in this document can be found in separate appendices at the end of this document.

291 Divisional Safeguarding Board

- 292 5.10. As an organisation Caretech children's services operates 3 Divisional Safeguarding Boards: Education,
293 Residential Care and Fostering. The main purpose of each board is to ensure that all services across
294 all divisions discharge their responsibilities effectively for assuring safe and secure services for
295 children and young people, and manage all safeguarding risks appropriately within its own workforce,
296 including direct employees and also the contracted workforce (supply workers/agency/contractor and
297 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

298 What staff should read and be aware of

- 299 5.11. KCSIE2021 guidance replaces Keeping Children Safe in Education 2020 updated in January 2021. The
300 changes will come into force from September 2021. The statutory guidance should be read and followed

301 by the Proprietor(s) of independent schools and non-maintained special schools and colleges. In both
302 instances this includes including Senior Leadership Teams.

303 5.12. All staff in Caretech/Cambian schools and colleges must read at least [Part one of KCSiE2021](#) guidance
304 and school/colleges should have a record to confirm this has been completed prior to 1st September 2021.

305 5.13. HTs / Principals and DSL (or a deputy) should read the [whole KCSiE2021 Guidance](#).

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

312 5.16 The guidance should be read alongside:

- 313 • statutory guidance - [Working Together to Safeguard Children](#)
- 314 • departmental advice - [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#)
315 ; and;
- 316 • [Part 5 of KCSiE2021](#) should be read alongside the departmental advice - [Sexual violence and sexual](#)
317 [harassment between children in schools and colleges](#) which contains further details on: what sexual
318 violence and sexual harassment constitutes, important context to be aware of, including; what is
319 consent, power imbalances, and developmental stages, harmful sexual behaviour (HSB), including
320 that a child displaying HSB may be an indication that they are a victim of abuse themselves, related
321 legal responsibilities for schools and colleges, advice on a whole school or college approach to
322 preventing child on child sexual violence and sexual harassment, and more detailed advice on
323 responding to reports of sexual violence and sexual harassment, including safeguarding and
324 supporting both the victim(s) and alleged perpetrator(s).

325 5.15. In July 2021 DSL (or a deputy) within Education division, Heads/Principals, Representative from Children's
326 residential care (Senior Managers), Representatives from Business Support Functions and Directors
327 attended KCSiE2021 webinar provided by the Safeguarding Network. Following the webinar, recording of
328 session and the additional learning resources have been shared with the participants to support
329 dissemination to their teams.

330 5.16. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how
331 the learning will take place with their staff, organise KCSiE2021 knowledge check (via Safeguarding
332 Network) and ensure that the record of completed knowledge check is stored on MYRUS - the
333 Organisation's Learning and Development platform .

334 5.17. The Heads/Principals and DSL should ensure that mechanisms are in place to assist staff to understand
335 and discharge their role and responsibilities as set out in Part one of KCSiE2021 guidance. Schools and

336 colleges and their staff are an important part of the wider safeguarding system for children. This system
337 is described in the statutory guidance [Working Together to Safeguard Children](#).

338 5.18. All staff should be aware of systems within their school or college which support safeguarding and these
339 should be explained to them as part of staff induction. This should include the:

- 340 - Child protection and safeguarding policy
- 341 - Behaviour Support policy
- 342 - Anti bullying policy
- 343 - Whistleblowing policy, Code of conduct and Code of Practice policy
- 344 - Missing from Care policy, local procedure for children missing from education
- 345 - Role of the DSL (including the identity of the DSL and any deputies)
- 346 - Have Access to policies and a copy of Part one of KCSIE2021
- 347 - All staff should be aware of their local early help process and understand their role in it, more
348 information can be found in [Working Together to Safeguard Children 2018](#)
349 ([publishing.service.gov.uk](#)).

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

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

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

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

369 **Whole service approach to Safeguarding**

370 5.23. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or
371 college approach to safeguarding. This means ensuring safeguarding and child protection are at the
372 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,
373 processes and policies should operate with the best interests of the child at their heart.

374 5.24. Where there is a safeguarding concern, the proprietor and service leaders should ensure the child's
375 wishes and feelings are taken into account when determining what action to take and what services to
376 provide. Systems should be in place, and they should be well promoted, easily understood and easily

377 accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and
378 knowing they can safely express their views and give feedback.

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

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

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

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

395 **6. Procedure**

396 **Roles and responsibilities**

397 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**
398 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and
399 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

400 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors,
401 partner organisations and visitors are aware of the policy and are supported to implement and work in
402 accordance with it, as well as creating a management culture that encourages a focus on safeguarding.

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

- 6.3. The **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.



Name: Cassandra Pollitt

Contact: 07525629529

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

- 422 and welfare (including online and digital safety) and when deciding whether to make a referral by
423 liaising with relevant agencies so that children's needs are considered holistically.
- 424 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,
425 where safeguarding concerns are linked to mental health.
- 426 • Refer all cases of suspected abuse or allegations of abuse to the Local Safeguarding Authority (child
427 or adult) and where appropriate - Local Authority Designated Officer (LADO).
- 428 • Liaise with the head teacher or principal (if they are not the DSL themselves) to inform him or her of
429 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police
430 investigations.
- 431 • As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for
432 child protection concerns in cases which concern a staff member.
- 433 • Refer cases to the Channel programme where there is a radicalisation concern as required.
- 434 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the
435 Disclosure and Barring Service as required; and
- 436 • Refer cases where a crime may have been committed to the Police as required.
- 437 • Act as a source of advice, support and expertise within the location when deciding to make a referral
438 by liaising with relevant agencies.
- 439 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and
440 child protection issues that children are experiencing, or have experienced, with teachers and school
441 and college leadership staff.
- 442 • Identify staff safeguarding training needs and organise training for their staff.
- 443 • Participate in local safeguarding boards when required.
- 444 • Evaluate and contribute to high standards of safeguarding practice at the location.
- 445 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are
446 guarded from harm or abuse.
- 447 • Ensure the child protection and safeguarding policy is available publicly and parents/those with
448 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be
449 made and the role of the school/college/home in this.
- 450 • Understands the relevant data protection legislation and regulations, especially The Data Protection
451 Act 2018.
- 452 6.5. More details about the role of the DSL including their availability, management of referrals, information
453 sharing, working with others, raising awareness and other can be found in [KCSIE 2021 Annex C – Role of](#)
454 [the DSL](#).
- 455 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where
456 asked do to so. There are arrangements for covering the role of the DSL when Cassandra Pollitt is
457 unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team

lead by a DSL with a number of deputies where required. Our Designated Deputies are Louise Sattin, Magda Lawrence and Chelsea Hicks

		
Name: Louise Sattin	Name: Magda Lawrence	Name: Chelsea Hicks
Contact: 07860752304	Contact: 01202 635630	Contact: 01202 635630

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

6.8. All staff will be given a personal copy of the booklet titled **25.15 Guide to Child Protection and Safeguarding at Cambian**.

6.9. There is **Appendix 3. Child Protection and safeguarding flowchart procedure**, which sets out clear steps to be followed when dealing with particular allegations, incidents or suspected physical injuries. Staff must use the correct forms when recording and managing concerns and allegations regarding the abuse of individuals. Education services must use Behaviour Watch system: Concern/Safeguarding function to record concerns. Where, throughout this policy, references are made to the 'concern form' this means either **25.04 Concern form** which is a word document (part of this policy) or the Behaviour Watch – Concern/Safeguarding functionality where the system is being used.

Information sharing and managing the child protection file

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

6.11. Records should include:

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

6.12. They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one of KCSIE2021. Schools and colleges using Behaviour Watch must set up their system Group purposes in line with Behaviour Watch guidance. Behaviour Watch 'Safeguarding Group' controls who can view and report on Concern/SG slips and 'Not Safeguarding Group' is an opposite Group to restrict who can complete certain sections within the Concern/SG slips.

6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for each pupil or student**. This goes beyond the legal minimum. It is good practice to give the school or

491 college additional options to make contact with a responsible adult when a child missing education is also
492 identified as a welfare and/or safeguarding concern.

493 **LADO referral criteria (KCSIE2021) – meeting the harm threshold**

494 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if they
495 continue to work in regular or close contact with children in their present position, or in any capacity with
496 children in a school or college. This guidance should be followed where it is alleged that anyone working
497 in the school or college that provides education for children under 18 years of age, including supply
498 teachers and volunteers has:

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

505 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the](#)
506 [Children Act 1989 as amended by the Adoption and Children Act 2002](#).

507 6.16. The last bullet point above includes behaviour that may have happened outside of school or college that
508 might make an individual unsuitable to work with children, this is known as transferable risk. Where
509 appropriate an assessment of transferable risk to children with whom the person works should be
510 undertaken. If in doubt seek advice from the local authority designated officer (LADO).

511 6.17. This above information relate to members of staff, supply staff and volunteers who are currently working
512 in any school or college regardless of whether the school or college is where the alleged abuse took place.
513 Allegations against a teacher who is no longer teaching should be referred to the police. Historical
514 allegations of abuse should also be referred to the police.

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

516 6.18. Many children and young people in our services (Education and care) organisation have an allocated
517 social worker due to safeguarding or welfare needs.

518 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's
519 experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally
520 disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

521 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this
522 information so that decisions can be made in the best interests of the child's safety, welfare and
523 educational outcomes. This should be considered as a matter of routine. There are clear powers to share
524 this information under existing duties on both local authorities and schools and colleges to safeguard and
525 promote the welfare of children.

526 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,
527 responding to unauthorised absence or missing education where there are known safeguarding risks) and
528 about promoting welfare (for example, considering the provision of pastoral and/or academic support,
529 alongside action by statutory services). Schools/colleges must follow missing from education protocol
530 agreed with their LA.

531 **Unexplained body marks**

532 6.22. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,
533 swellings, cuts and scratches which by and large will be as a result of daily activities or for some Individuals
534 as a result of self-injurious behaviour. However, all marks or physical changes must be recorded
535 appropriately using (number to be added) weekly body chart. A Concern form must be completed for all
536 unexplained marks and physical changes and passed to the DSL (or a deputy) along with copies of the last

537 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always be kept
538 informed. Concern log should be updated with concern and relevant reference number provided to
539 concern.

540 6.23. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the
541 correct course of action for dealing with unexplained body marks.

542 6.24. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no
543 reasonable explanation can be given the DSL must contact the Safeguarding Authority/LADO for further
544 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

545 6.25. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be
546 opened and safeguarding process followed.

547 6.26. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome
548 must be shared with social worker and parents.

549 **Disclosure from an Individual**

550 6.27. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**
551 **procedure.**

552 6.28. It is important to note that children/young people may not find it easy to tell staff about their abuse
553 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react
554 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a
555 member of school or college staff may overhear a conversation that suggests a child has been harmed or
556 a child's/young person's own behaviour might indicate that something is wrong. If staff have any
557 concerns about a child's/young person's welfare, they should act on them immediately rather than wait
558 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**
559 **procedure.**

560 6.29. In case of reports of sexual violence and sexual harassment between children and young people, these
561 are extremely complex to manage. It is essential that victims are protected, offered appropriate support
562 and every effort is made to ensure their education and care is not disrupted. It is also important that
563 other children, young people and staff are supported and protected as appropriate.

564 6.30. The service's initial response to a report from a child is incredibly important. How the staff respond to a
565 report can encourage or undermine the confidence of future victims of sexual violence and sexual
566 harassment to report or come forward.

567 6.31. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.
568 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage
569 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding
570 Authority) to discuss next steps. Staff should only share the report with those people who are necessary
571 in order to progress it. It is important that the victim understands what the next steps will be and who
572 the report will be passed to.

573 6.32. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how
574 the report will be progressed, don't ask leading questions and only prompt the child where necessary
575 with open questions – where, when, what, etc. It is important to note that whilst leading questions should
576 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

577 6.33. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or
578 college staff. It is important that the person to whom the child discloses recognises that the child has
579 placed them in a position of trust. They should be supportive and respectful of the child.

580 6.34. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report
581 and immediately write up a thorough summary. This allows the staff member to devote their full
582 attention to the child and to listen to what they are saying. It may be appropriate to make notes during
583 the report (especially if a second member of staff is present). However, if making notes, staff should be
584 conscious of the need to remain engaged with the child and not appear distracted by the note taking.

585 Either way, it is essential a written record is made using Concern form which is part of this policy. The
586 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report
587 to the DSL must be completed within an hour from the moment of the disclosure being made.

588 6.35. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of
589 the note taker. Staff should be aware that notes of such reports could become part of a statutory
590 assessment by Safeguarding Authority and/or part of a criminal investigation.

591 6.36. In cases where either a child/young person informs the staff that an act of FGM – however described –
592 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that
593 an act of FGM has been carried out these situations, the DSL must be informed, who will trigger child
594 protection/safeguarding procedures described in this policy and contact the Police. If a child/young
595 person is at immediate risk – the Police (999) must be contacted immediately. If a child/young person
596 required medical attention follow steps identified in **'Setting priorities'** section below.

597 6.37. Remember, **do not**:

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

603 6.38. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**
604 **and recording procedure.**

605 6.39. All staff know that they can contact the Local Authority direct should that be necessary. Where a
606 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding
607 Adult Board. Where someone is over 18 but still receiving children's services, the matter should be dealt
608 with by the local Safeguarding Adult Board.

609 6.40. For allegation made against a staff member or senior managers/directors follow relevant allegations
610 procedures described later on in this policy.

611 6.41. Where contact is made with the Local Authority in which Cambian Wing College is geographically located,
612 contact will also be made with the individual's own Local Authority and also the child/young person's
613 social worker. This will be completed by one of the members of the school/college/home's safeguarding
614 team.

615 6.42. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be
616 informed immediately and they can take immediate protective action as necessary.

617 6.43. If a member of staff feels their concerns are not being taken seriously then they are to inform a more
618 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding
619 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128.**

6 Risk Assessment

621 6.44. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk
622 and needs assessment. Where there has been a report of sexual harassment, the need for a risk

623 assessment should be considered on a case-by-case basis. The risk and needs assessment should
624 consider:

- 625 • the victim, especially their protection and support,
- 626 • whether there may have been other victims,
- 627 • the alleged perpetrator(s); and
- 628 • all the other children, (and, if appropriate, adult students and staff) at the school or college
629 especially, and any actions that are appropriate to protect them from the alleged
630 perpetrator(s), or from future harms.

631 6.45. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times,
632 staff should be actively considering the risks posed to all their pupils and students and put adequate
633 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are
634 engaging with Safeguarding Authority and specialist services as required. Where there has been a report
635 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence
636 specialists will be required. The above school or college risk assessment is not intended to replace the
637 detailed assessments of expert professionals. Any such professional assessments should be used to
638 inform the school's or college's approach to supporting and protecting their pupils and students and
639 updating their own risk assessment.

640 Following a report - what to consider

641 6.46. Important considerations will include:

- 642 • the wishes of the victim in terms of how they want to proceed. This is especially important in
643 the context of sexual violence and sexual harassment. Victims should be given as much control
644 as is reasonably possible over decisions regarding how any investigation will be progressed and
645 any support that they will be offered. This will however need to be balanced with the school's
646 or college's duty and responsibilities to protect other children;
- 647 • the nature of the alleged incident(s), including whether a crime may have been committed
648 and/or whether HSB has been displayed;
- 649 • the ages of the children involved;
- 650 • the developmental stages of the children involved;
- 651 • any power imbalance between the children. For example, is the alleged perpetrator(s)
652 significantly older, more mature or more confident? Does the victim have a disability or
653 learning difficulty?
- 654 • if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be
655 accompanied by other forms of abuse and a sustained pattern may not just be of a sexual
656 nature);
- 657 • that sexual violence and sexual harassment can take place within intimate personal
658 relationships between peers;
- 659 • are there ongoing risks to the victim, other children, adult students or school or college
660 staff; and
- 661 • other related issues and wider context, including any links to child sexual exploitation and
662 child criminal exploitation.

663 6.47. As always when concerned about the welfare of a child, all staff should act in the best interests of the
664 child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout

665 this guidance. Immediate consideration should be given as to how best to support and protect the victim
666 and the alleged perpetrator(s) (and any other children involved/impacted).

667 Options to manage the report

668 6.48. It is important that schools and colleges consider every report on a case-by-case basis. When to inform
669 the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going
670 to be made to Safeguarding Authority and/or the police, then, as a general rule, the school or college
671 should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be
672 informed of the allegations. However, as per general safeguarding principles, this does not and should
673 not stop the school or college taking immediate action to safeguard their children, where required.

674 6.49. There are four likely scenarios for schools and colleges to consider when managing any reports of sexual
675 violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are
676 regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly
677 important to look out for potential patterns of concerning, problematic or inappropriate behaviour.
678 Where a pattern is identified, the school or college should decide on a course of action. Consideration
679 should be given as to whether there are wider cultural issues within the school or college that enabled
680 the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training
681 could be delivered to minimise the risk of it happening again. The four scenarios are:

- 682 • **Manage internally;** In some cases of sexual harassment, for example, one-off incidents,
683 the school or college may take the view that the children concerned are not in need of early
684 help or that referrals need to be made to statutory services and that it would be
685 appropriate to handle the incident internally, perhaps through utilising their behaviour
686 policy and by providing pastoral support.
- 687 • **Early help:** In line with the above, the school or college may decide that the children
688 involved do not require referral to statutory services but may benefit from early help. Early
689 help means providing support as soon as a problem emerges, at any point in a child's life.
690 Providing early help is more effective in promoting the welfare of children than reacting
691 later. Early help can be particularly useful to address non-violent HSB and may prevent
692 escalation of sexual violence. It is particularly important that the DSL (and their deputies)
693 know what the Early Help process is and how and where to access support.
- 694 • **Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm,
695 or is in immediate danger, schools and colleges should make a referral to the local
696 Safeguarding Authority. At the point of referral, schools and colleges will generally inform
697 parents or carers, unless there are compelling reasons not to (if informing a parent or
698 carer is going to put the child at additional risk). Any such decision should be made with
699 the support of children's social care.
- 700 • **Reporting to the Police** - any report to the police will generally be in parallel with a referral
701 to children's social care (as above. It is important that the DSL and their deputies) are clear
702 about the local process for referrals and follow that process.

703 6.50. More information about the four areas listed above, considering bail conditions, managing any delays in
704 the criminal process and the end of criminal process can be found in [KCSIE2021 Part 5 para 452.](#)

705 Unsubstantiated, unfounded, false or malicious reports

706 6.51. If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider
707 whether the child and/or the person who has made the allegation is in need of help or may have been

708 abused by someone else and this is a cry for help. In such circumstances, a referral to Safeguarding
709 authority may be appropriate.

710 6.52. If a report is shown to be deliberately invented or malicious, the school or college, should consider
711 whether any disciplinary action is appropriate against the individual who made it as per their own
712 behaviour policy.

7 Safeguarding and supporting the victim

714 6.53. The needs and wishes of the victim should be paramount (along with protecting the child) in any
715 response. It is important they feel in as much control of the process as is reasonably possible. Wherever
716 possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority
717 should be to make the victim's daily experience as normal as possible, so that the school or college is a
718 safe space for them.

719 6.54. Consider the age and the developmental stage of the victim, the nature of the allegations and the
720 potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual
721 violence and sexual harassment, a power imbalance is likely to have been created between the victim
722 and alleged perpetrator(s).

723 6.55. The victim should never be made to feel that they are the problem for making a report or made to feel
724 ashamed for making a report. This has been made clear throughout this policy and procedure.

725 6.56. Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The
726 support required regarding a one-off incident of sexualised name-calling is likely to be vastly different
727 from that for a report of rape.

728 6.57. Services should be aware that sexual assault can result in a range of health needs, including physical,
729 mental, and sexual health problems and unwanted pregnancy. Children and young people that have a
730 health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault
731 Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors
732 of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children
733 and adults, regardless of when the incident occurred.

734 6.58. More information about Early help, Children and young people's Independent Sexual Violence Advisors
735 and ChISVAs services (where available), CAMHS and other can be found in [KCSIE 2021 Part 5 para 456](#).

7 Safeguarding and supporting the alleged perpetrator(s)

737 6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice:
738 [Sexual violence and sexual harassment between children at schools and colleges](#). The following principles
739 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding
740 and supporting the alleged perpetrator(s):

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

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

751 • Consider the proportionality of the response. Support (and sanctions) should be
752 considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet
753 needs (in some cases these may be considerable) as well as potentially posing a risk of harm

754 to other children. HSB in young children may be (and often are) a symptom of either
755 their own abuse or exposure to abusive practices and or materials.

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

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

763 6.60. More information in relation to this section can be found in [KCSIE 2021 Part 5 para 464.](#)

764 Setting priorities

765 6.61. The priority, at all stages throughout the child protection or safeguarding process, is the interests and
766 safety of the individual.

767 6.62. Where appropriate, any concerns will be discussed with the Individual's family / carers and where
768 possible their agreement will be sought to making a referral to the Local Authority. However, where
769 there is a conflict of interests between the Individual and parent/guardian, the interests of the Individual
770 must take priority and Cambian Wing College reserves the right to contact the Individual's local authority,
771 Social Care or the Police, without notifying parents/carers if this is in their best interests.

772 6.63. If an urgent medical attention or advice is required and GP/speciality doctor is not available, staff MUST
773 use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.

774 6.64. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance.
775 Alternatively, if it's assessed to be in the best interest of the child/young person - the DSL MUST take the
776 Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local
777 Authority/Police, remembering that every reasonable effort should be made to inform the parents/carers
778 as soon as possible.

779 6.65. If the suspected abuse is sexual, then the medical professional must determine if the medical examination
780 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility
781 that the needs of the young person are such that medical attention is the priority, in such case medical
782 professional's judgment must be followed. There must at all times be an Appropriate adult (parent
783 guardian or a social worker) with the individual whether from the Individual's care home/school/college,
784 the Local Authority or the Police, if the parents/carers are not included. This section must be read in
785 conjunction with our **0.29. Child Sexual Exploitation policy.**

786 6.66. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak for
787 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA.
788 Further information on MCA are available in our **0.13. Mental Capacity and Consent policy.**

789 Allegation of abuse by one or more Individuals on another Individual

790 6.67. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for
791 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual
792 is suffering or likely to suffer significant harm'. DSL must refer peer on peer abuse to a Safeguarding
793 Authority, local Authority and Regulator.

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

795 6.68. If we were given information that suggested that someone who does not reside at or attends our location
796 has been abused by one of our members of staff, the DSL would immediately report this to the Local
797 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted.
798 Should the staff member be involved we would then formally advise the member of staff of the allegation,
799 making it clear that we would not play any part in the investigatory process. The employee would be
800 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived
801 risks) etc., in exactly the same way as if the allegation had involved an Individual at our

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

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

6.69. 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 of Service must be kept informed. DSL will follow advice provided by the leading agency and report back to the Head of Service who will explore any associated risk/s in relation to the provision.

Allegations against staff

6.70. All allegations must be reported to the DSL Cassandra Pollitt or in their absence to a DSL Deputy – see your local Safeguarding poster. Also, where appropriate - HR Business Partner must be consulted.

6.71. 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).**

6.72. 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.

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

Allegations against staff in Education

6.74. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors. KCSIE2021 splits the type of allegations into two groups:

- Allegations that may meet the harms threshold (see **LADO referral criteria (KCSIE2021) – meeting the harm threshold** of this policy)
- Allegation/concerns that do not meet the harms threshold – referred in the guidance and this policy as ‘low level concerns’.

6.75. 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 KCSIE2021 guidance should be followed where allegations are made against anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers.

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

6.77. Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority’s procedures for dealing with non-recent

849 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no
850 matter how long ago it happened.

851 6.78. Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher
852 because of serious misconduct, or might have dismissed them or ceased to use their services had they
853 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching
854 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found
855 on GOV.UK.

8 Allegations against supply teachers and all workers supplied by agency

857 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual not
858 directly employed by them, where its disciplinary procedures do not fully apply because agencies will
859 have their own policies and procedures; for example, supply teachers or contracted staff provided by an
860 employment agency or business.

861 6.80. Whilst The Organisation's schools and colleges are not the employer of supply teachers, they should
862 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease
863 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the
864 LADO to determine a suitable outcome. Schools and colleges must also consult HR Business Partner who
865 may advise further. Governing bodies and proprietors should discuss with the supply agency or agencies
866 where the supply teacher is working across a number of schools of colleges, whether it is appropriate to
867 suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry
868 out their investigation.

869 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or
870 children's social care. The school or college will usually take the lead because agencies do not have direct
871 access to children or other school of college staff, so they will not be able to collect the facts when an
872 allegation is made, nor do they have all the relevant information required by the LADO as part of the
873 referral process.

874 6.82. When using a supply agency, schools and colleges should inform the agency of its process for managing
875 allegations but also take account of the agency's policies and investigatory process and their duty to refer
876 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or
877 equivalent to meetings and keeping them up to date with information about its policies. It is important
878 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be
879 consulted.
880

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

882 6.83. All allegations must be reported to:

883 - Education division: Regional Education Lead Lisa Lyon, unless within residential education Registered
884 Manager is the DSL in which case the matter will be referred to the Head/ Principal. For the DSL
885 fulfilling the role as their substantive role, all allegations must be reported to the Principal/Head.

886 - Children's residential care division: Regional Manager Helen Hoggins, unless Regional Manager is the
887 DSL in which case the matter will be referred to the Managing Director.

888 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above) will
889 then refer the matter to LADO and notify their line manager:

890 - Education division: Regional Education Lead Lisa Lyon

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

893 - Children's residential care division: Managing Director.

894 6.85. The person who referred the matter to LADO in line with agreed course of action will make a decision
895 about who will lead the case including management investigation – should the allegation threshold be

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

898 6.86. In residential education associated with children's homes/care homes the Responsible/Nominated
899 Individual MUST also be notified.

900 6.87. Services using Behaviour Watch system – allegations made against the DSL or DSL Deputy who have full
901 access to the system including Concern/Safeguarding function, should not be initially entered to the
902 system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as they would
903 have been prior to implementation of the Behaviour Watch. This is to ensure that no one, including those
904 who are part of the service's Safeguarding Team are able to see the details of their own case which could
905 have a detrimental impact on the investigation itself and the outcome of it. However, once the case has
906 been concluded, a decision should then be made about whether or not the detail related to the case
907 should be retrospectively entered in to Behaviour Watch or kept in the original format. Such a decision
908 should be made by the Case Manager, Managing Director and a member of HR Team. Should a decision
909 be made to keep it in the original format, a Concern/SG slip in the Behaviour Watch must still be
910 retrospectively opened and a note added to reflect that there was an allegation made against the DSL/DSL
911 Deputy but without specifying any further detail about the character of the allegation. Instead a reference
912 number of the case and location of the pack related to the case is provided. This action will ensure that
913 the case has been captured in the system which will then allow the service to generate a log with accurate
914 numbers of concerns and safeguarding cases for the service.

9 Allegations against the Regional Manager/other Regional staff

916 6.88. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
917 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
918 to the identified senior person to follow through with LADO and subsequently act in line with agreed
919 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
920 will have no further part in the process regarding gathering any information or, should it be required, in
921 the actual investigation in relation to a senior member.

922 6.89. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to
923 LADO and act in line with agreed course of action.

924 6.90. The appropriate HR Business Partner should be notified, so they can advise and where required - support
925 the investigation.

9 Allegations against the Managing Director

927 6.91. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
928 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
929 to the identified senior person to follow through with LADO and subsequently act in line with agreed
930 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
931 will have no further part in the process regarding gathering any information or, should it be required, in
932 the actual investigation in relation to a senior member.

933 6.92. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the
934 matter LADO and act in line with agreed course of action.

935 6.93. The Head of HR should be notified, so they can advise and where required - support the investigation.

9 Allegations against any other Senior Leader

937 6.94. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
938 Head/Principal) who will make the initial referral to LADO Following this, the allegation should be passed
939 to the identified senior person to follow through with LADO and subsequently act in line with agreed
940 course of action. This means that the DSL will retain the responsibility to report the initial concern, but

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

943 6.95. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)
944 line manager who will refer the matter LADO and act in line with agreed course of action.

945 6.96. The Head of HR should be notified, so they can advise and where required - support the investigation.

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

947 6.97. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
948 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
949 to the identified senior person to follow through with LADO and subsequently act in line with agreed
950 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
951 will have no further part in the process regarding gathering any information or, should it be required, in
952 the actual investigation in relation to a senior member.

953 6.98. Allegations not linked to specific site must be reported to the Chair of the Care Governance Committee -
954 Moira Livingstone - who will refer the matter to LADO and act in line with agreed course of action.

955 6.99. The Head of HR should be notified, so they can advise and where required - support the investigation.

956 Allegations against the Chief Executive Officer

957 6.100. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the
958 Head/Principal) who will make the initial referral to LADO. Following this, the allegation should be passed
959 to the identified senior person to follow through with LADO and subsequently act in line with agreed
960 course of action. This means that the DSL will retain the responsibility to report the initial concern, but
961 will have no further part in the process regarding gathering any information or, should it be required, in
962 the actual investigation in relation to a senior member.

963 6.101. Allegations not linked to a specific site must be reported to the Chair of the Care Governance Committee
964 - Moira Livingstone who will refer the matter to LADO and act in line with agreed course of action.

965 6.102. The Head of HR should be notified, so they can advise and where required - support the investigation.

966 Low level concerns

967 6.103. As part of their whole school approach to safeguarding, schools and colleges should ensure that they
968 promote an open and transparent culture in which all concerns about all adults working in or on behalf
969 of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly
970 and appropriately.

971 6.104. Creating a culture in which all concerns about adults (including allegations that do not meet the harms
972 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is
973 critical. If implemented correctly, this should encourage an open and transparent culture; enable schools
974 and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of
975 abuse; and ensure that adults working in or on behalf of the school or college are clear about professional
976 boundaries and act within these boundaries, and in accordance with the ethos and values of the
977 institution.

978 6.105. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards
979 a child does not meet the threshold set out in **LADO referral criteria (KCSIE2021) – meeting the harm**

980 **threshold section. If there is any doubt about whether or not the concern meets LADO referral criteria**
981 **– LADO should be contacted and advice sought.**

982 6.106. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of
983 unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have
984 acted in a way that:

- 985 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of
986 work; and
- 987 • does not meet the allegations threshold or is otherwise not considered serious enough to
988 consider a referral to the LADO

989 6.107. Examples of such behaviour could include, but are not limited to:

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

996 6.108. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may
997 look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately
998 intended to enable abuse.

999 6.109. It is crucial that any such concerns, including those which do not meet the harm threshold (see [Part Four](#)
1000 [- Section one](#)), are shared responsibly and with the right person, and recorded and dealt with
1001 appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf
1002 of schools and colleges from potential false allegations or misunderstandings.

1003 The initial response to allegation

1004 6.110. Where the school or college identifies a child/young person has been harmed, that there may be an
1005 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact
1006 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are
1007 two aspects to consider when an allegation is made:

- 1008 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is
1009 not at risk and referring cases of suspected abuse to the local authority children’s social
1010 care as described in Part one of this guidance.
- 1011 • **Investigating and supporting the person subject to the allegation** - the case manager
1012 should discuss with the LADO, the nature, content and context of the allegation, and agree
1013 a course of action.

1014 6.111. When dealing with allegations, schools and colleges should:

- 1015 • apply common sense and judgement
- 1016 • deal with allegations quickly, fairly and consistently; and
- 1017 • provide effective protection for the child and support the person subject to the allegation.

1018 6.112. Schools and colleges should ensure they understand the local authority arrangements for managing
1019 allegations, including the contact details and what information the LADO will require when an allegation
1020 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with

1021 local procedures to establish the facts to help them determine whether there is any foundation to the
1022 allegation, being careful not to jeopardise any future police investigation. For example:

- 1023 • was the individual in the school or college at the time of the allegations?
- 1024 • did the individual, or could they have, come into contact with the child?
- 1025 • are there any witnesses? and,
- 1026 • was there any CCTV footage?

1027 6.113. These are just a sample of example questions. Services should be familiar with what initial information
1028 the LADO will require. This information can be found in local policy and procedural guidance provided by
1029 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared
1030 with the HR department to support any investigation.

1031 6.114. When to inform the individual of the allegation should be considered carefully on a case by case basis,
1032 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1033 6.115. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion
1034 involving the police and/or children's social care will be convened in accordance with the statutory
1035 guidance [Working Together to Safeguard Children](#).

1036 6.116. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the
1037 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps
1038 with the case manager (A 'case manager' will be the person leading any investigation. This will be either the
1039 DSL/DSL Deputy which is often the Principal/Head/Registered Manager or, where the case manager is
1040 the subject of an allegation, it will be the Proprietor or a Director nominated by them). A LADO should be
1041 informed who will lead investigation to ensure there is no conflict of interest or any other concerns
1042 related to the choice of the case manager.

1043 **No Further Action**

1044 6.117. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO
1045 should:

- 1046 • record the decision and justification for it; and,
- 1047 • agree on what information should be put in writing to the individual concerned and by
1048 whom.

1049 **Further enquiries**

1050 6.118. Where further enquiries are required to enable a decision about how to proceed, the LADO and case
1051 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,
1052 the investigation should normally be undertaken by a senior member of the school's or college's staff.

1053 6.119. Where there is a lack of appropriate resource within the school or college, or the nature or complexity
1054 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional
1055 Manager (Education or Care), a Director, HR Business Partner or an independent investigator if
1056 appropriate.

1057 6.120. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as
1058 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,
1059 depending on the complexity of the case.

1060 6.121. Wherever possible, the first review should take place no later than four weeks after the initial
1061 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review
1062 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges
1063 when considering allegations against adults working with children. The LADO's role is not to investigate

1064 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,
1065 children's social care, the school or college, or a combination of these.

1056 **Suspension**

1067 6.122. Suspension should not be an automatic response when an allegation is reported. All options to avoid
1068 suspension should be considered prior to taking that step. The case manager must consider carefully
1069 whether the circumstances warrant suspension from contact with children at the school or college, or
1070 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a
1071 child or other children at the school or college is/are at risk of harm, or the allegation could be considered
1072 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR
1073 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been
1074 involved. More information on suspension and associated process can be found in [KCSIE 2021 Part 4 page](#)
1075 [86 – 87.](#)

1056 **Supporting those involved**

1077 6.123. The welfare of a child/young person is paramount (how children should be protected and supported is
1078 set out throughout KCSIE2021 guidance) and this will be the prime concern in terms of investigating an
1079 allegation against a person in a position of trust. However, when an allegation or safeguarding concern is
1080 being investigated it is likely to be a very stressful experience for the adult subject of the investigation,
1081 and potentially for the family members. It is important that an employer offers appropriate welfare
1082 support at such a time and recognises the sensitivity of the situation. Information is confidential and
1083 should not ordinarily be shared with the other staff or with children or parents who are not directly
1084 involved in the investigation. More about employers duty of care to their employees can be found in
1085 [KCSIE2021 part 4/Duty of care.](#)

1086 6.124. Staff whom allegation/s have been made against must always be supported and if suspended they will
1087 receive a support person (nominated contact), any suspension is not an indication of guilt.

1056 **Allegation outcomes**

1089 6.125. The definitions that should be used when schools and colleges determine the outcome of an allegation
1090 are set out below:

- 1091 • Substantiated: there is sufficient evidence to prove the allegation;
- 1092 • Malicious: there is sufficient evidence to disprove the allegation and there has been a
1093 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1094 • False: there is sufficient evidence to disprove the allegation;
- 1095 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.
1096 The term, therefore, does not imply guilt or innocence; or
- 1097 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the
1098 allegation being made.

1099 6.126. It should be noted that these definitions are available to support the decision-making process. However,
1100 in certain cases, in the absence of any substantiating evidence, the Company may still progress through
1101 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief
1102 that an employee has committed an act of misconduct.

1103 6.127. Ultimately the options open to the school or college depend on the nature and circumstances of the
1104 allegations and the evidence and information available. This will range from taking no further action, to
1105 dismissal or a decision not to use the person's services in future. Suspension should not be the default

1106 position, an individual should be suspended only if there is no reasonable alternative ([see paragraphs](#)
1107 [361-368 on suspension](#)).

1108 Serious incident reporting

1109 6.128. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported
1110 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

1111 Death of someone in our care including rapid response to unexpected death

1112 6.129. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the
1113 rapid response process described below:

1114 • Call the Ambulance and Police

1115 • Unless the 999 operator tells you to, do not touch the person, do not move anything around them
1116 which may form part of forensic evidence. Police will make a decision about the forensic examinations
1117 and appropriate security of the scene.

1118 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI) reporting
1119 procedure. The DSL will contact the Managing Director of the division they work in and verbally inform
1120 them of what happened before completing SUI Part 2.

1121 • DSL will contact Children's/Adults Social Care Team

1122 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services (CAMHS)
1123 should also be notified by the Safeguarding Authority.

1124 6.130. Once the above rapid steps have been taken, further steps described below must be followed.

1125 6.131. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the
1126 following within 24 hours:

1127 • Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager
1128 following the **35.01. Caretech Children's services SUI process.**

1129 • Next of kin/parents/carer of the deceased.

1130 • Where the death of an individual occurs in an education location the assistance of the local police and
1131 social services department should be sought in informing the parents/guardians.

1132 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn

1133 • Ministry of justice if applicable.

1134 • The placing authority/authorities.

1135 • The local authority responsible for Social Services and Education (where the death takes place in a
1136 registered school) within whose area the education location is situated.

1137 • The District Health Authority within whose area the education location is situated.

1138 • The Department for Education, (where the death takes place in a registered school).

1139 • The Health and Safety Executive.

1140 Abuse of position of trust

1141 6.132. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,
1142 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the
1143 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a
1144 position of trust, even if the relationship is consensual. This means that any sexual activity between a

1145 member of the staff and a young person under 18 may be a criminal offence, even if that young person
1146 is over the age of consent.

1147 **Visitors**

1148 6.133. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.
1149 All unauthorised visitors will be challenged by staff and reported to the home manager/head/principal
1150 before entry is authorised.

1151 **Volunteers**

1152 6.134. Volunteers undergo checks commensurate with their work in the home/school/college and contact with
1153 children, young people and adults i.e. if they are in regulated activity or not.

1154 **Contractors**

1155 6.135. We will check the identity of all contractors working on site and requests the full range of DBS and other
1156 required checks where they work in regulated activity or unsupervised in accordance with the latest
1157 government guidance.

1158 **Use of school or college premises for non-school/college activities**

1159 6.136. Where governing bodies or proprietors hire or rent out school or college facilities/premises to
1160 organisations or individuals (for example to community groups, sports associations, and service providers
1161 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in
1162 place to keep children safe. More information can be found in [KCSIE2021 Part 2 para 155 & 156](#).

1163 **Extended school and off-site arrangements**

1164 6.137. Where extended off-site activities are provided by and managed by us, our safeguarding policy and
1165 procedures apply. If other organisations provide services or activities on our site we will check that they
1166 have appropriate policies and procedures in place, including safer recruitment procedures and clarify
1167 whose procedure is to be followed if there are concerns. There will be clear communication channels to
1168 ensure the DSL is kept appropriately informed.

1169 6.138. When our Individuals are doing off-site activities, including day and residential visits and work related
1170 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL
1171 will be kept appropriately informed.

1172 **Use of mobile phones**

1173 6.139. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media
1174 access including **Pro 01. Mobile Telephony Policy** at all times.

1175 6.140. All computer equipment and internet access within the home/school/college is subject to 'parental
1176 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social
1177 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons

1178 during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the
1179 many learning and social opportunities available through the internet and social media.

1180 6.141. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST
1181 neither mention Cambian Wing College nor make reference to their employment at the home. Staff are
1182 advised not to communicate with parents, guardians, carers or Individuals via social networking sites

1183 **Photography and images**

1184 6.142. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1185 6.143. The vast majority of people who take or view photographs or videos of Individuals do so for entirely
1186 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through
1187 taking or using images, so we have some safeguards in place.

1188 6.144. To protect our children, young people or young adults we will:

- 1189 • seek their consent for photographs to be taken or published (for example, on our website or in
1190 newspapers or publications)
- 1191 • seek parental consent of consent from the Individual
- 1192 • not use their full name with an image, only their initials
- 1193 • ensure that personal data is not shared
- 1194 • store images appropriately, securely and for no longer than necessary
- 1195 • only use school equipment, i.e. not personal devices
- 1196 • encourage our children, young people and adults to tell us if they are worried about any photographs
1197 that are taken of them

1198 **Physical intervention and use of reasonable force**

1199 6.145. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are
1200 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**
1201 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,
1202 recorded and monitored.

1203 **Staff Taking Medication or other substances**

1204 6.146. Staff members must not be under the influence of alcohol or any other substance which may affect their
1205 ability to care for the Individuals. If they are taking medication they should seek medical advice and
1206 inform the Home Manager/Head/Principal who will review the medical advice and take a decision as to
1207 whether they are fit for work.

1208 6.147. We only allow staff to work if medical advice confirms that their ability to look after Individuals is unlikely
1209 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it
1210 must be securely stored and out of reach of all children, young people and young adults. This section
1211 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

1212 **Information for individuals and relatives/carers**

1213 6.148. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt
1214 with independently and that they will be kept involved in the process to the degree that they wish to be.
1215 They will be reassured that they will receive help and support in taking action.

1216 6.149. They will also be advised that they can nominate an advocate or representative to speak and act on their
1217 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could
1218 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be
1219 appointed. They will be advised of rights to legal aid in where appropriate to victim support and
1220 compensation.

1221 **Recruitment and vetting**

1222 6.150. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**
1223 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1224 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting
1225 schools should read the whole KCSIE2021 guidance including Part 3 dedicated to Safer Recruitment.

1226 6.151. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply
1227 teaching and teacher trainees, agency care staff as well as multisite managers and members of the
1228 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1229 6.152. For agency workers we obtain written confirmation that all checks have been completed, in line with
1230 safer recruitment from the employment business that is supplying the member of agency staff. All
1231 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in
1232 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate
1233 before that person can begin work at the home/school/college.

1234 6.153. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the
1235 agency.

1236 6.154. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the
1237 same recruitment regulations and procedures as the education staff.

1238 Requirements to inform Disclosure and Barring Services (DBS)

1239 6.155. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the
1240 barred lists is required.

1241 6.156. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one
1242 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to
1243 safeguarding concerns, or would have been had they not resigned.

1244 6.157. In the case of a member of teaching staff at a school or sixth form college, the case manager must
1245 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching
1246 [\(paragraph 143 for further information\)](#).

1247 6.158. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,
1248 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she
1249 is considered unsuitable to work with children and young people.

1250 6.159. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is
1251 provided at paragraph 179.

1252 6.160. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they can
1253 ensure any future references are correct. The references team log referrals so this can be completed. This
1254 will apply to both: DBS and TRA.

1255 Record-keeping

1256 6.161. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is
1257 made, staff must keep clear and accurate records using a Concern Form.

1258 6.162. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in
1259 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns
1260 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch
1261 have Concern/Safeguarding function to record any concerns being raised. A report per child/young
1262 person can also be generated.

1263 6.163. Records should be factual, accurate, concise, ethical and relevant.

1264 6.164. All recording of written information should be legible and discussions with other professionals and
1265 agencies should be recorded chronologically.

1266 6.165. There will be a safeguarding section/folder for each Individual which will hold any concerns/safeguarding
1267 documentation for that individual. At the front of each folder there is an Index for Individual's Concerns.
1268 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1269 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure
1270 location.

1271 6.166. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**
1272 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information
1273 where the concern has escalated. Where this is held as a paper version this is to be made into a bound
1274 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies
1275 only. In either case this should be kept in a secure location.

1276 Monitoring

1277 6.167. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,
1278 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**
1279 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators
1280 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the
1281 position of every site in relation to their KPIs is produced every Wednesday.

1282 Training

1283 6.168. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction
1284 introduces the new staff member to the policy, procedure and practice at the location. They will also be
1285 orientated as to where to find information regarding safeguarding including relevant posters around the
1286 location. As part of their induction all staff are required to read this policy and confirm that they
1287 understand their role in safeguarding and protecting young people within the service they are going to
1288 work.

1289 6.169. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must
1290 be completed as part of staff member induction and annually thereafter. This should include online
1291 safety. This is to maintain staff awareness of their responsibilities in relation to children /young
1292 people/young adult's safeguarding.

1293 6.170. Staff will not be allowed to work with Individuals unless they have completed the above training. The
1294 school/college/home must check that supply/agency staff have completed basic awareness training
1295 before being allowed into contact with Individuals.

1296 6.171. Contractors and others on site who might have unsupervised access to Individuals must also complete
1297 basic awareness training before being allowed to start work.

1298 6.172. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and
1299 practice throughout the year. This can be undertaken in various forums: as a face to face or online
1300 session, staff meetings or workshops. In addition to this safeguarding updates are provided to schools
1301 and colleges by the external Safeguarding Network.

1302 6.173. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge
1303 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA
1304 within the boundaries they operate and be refreshed at least every two years. Both should also undertake
1305 Prevent awareness training.

1306 Confidentiality and information sharing

1307 6.174. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting
1308 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear
1309 powers to share, hold and use information for these purposes. Staff should be proactive in sharing
1310 information as early as possible to help identify, assess and respond to risks or concerns about the safety
1311 and welfare of children/ young people whether this is when problems are first emerging, or where a child
1312 is already known to local authority children's social care.

1313 6.175. Where the police are involved, wherever possible the school or college should ask the police to obtain
1314 consent from the individuals involved to share their statements and evidence for use in the employer's

- 1315 disciplinary process. This should be done as their investigation proceeds and will enable the police to
1316 share relevant information without delaying the conclusion of their investigation or any court case.
- 1317 6.176. The Safeguarding authority should adopt a similar procedure when making enquiries to determine
1318 whether the child or children named in the allegation are in need of protection or services, so that any
1319 information obtained in the course of those enquiries which is relevant to a disciplinary case can be
1320 passed to the employer without delay.
- 1321 6.177. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the
1322 following:
- 1323 • who needs to know and exactly what information can be shared;
 - 1324 • how to manage speculation, leaks and gossip
 - 1325 • what, if any, information can be reasonably given to the wider community to reduce speculation;
1326 and
 - 1327 • how to manage press interest if, and when, it should arise.
- 1328 6.178. Exchange or disclose of personal information with other agencies will be completed in accordance with
1329 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including
1330 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process
1331 personal information fairly and lawfully and to keep the information they hold safe and secure.
- 1332 6.179. Information relating to individual Safeguarding cases is confidential, although some information can be
1333 shared with relevant staff. This should be done only on a 'need to know' basis.
- 1334 6.180. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data
1335 protection principles, which allow them to share (and withhold) personal information, as provided for in
1336 the Data Protection Act 2018 and the GDPR. This includes:
- 1337 • being confident of the processing conditions which allow them to store and share information for
1338 safeguarding purposes, including information which is sensitive and personal, and should be treated
1339 as 'special category personal data'.
 - 1340 • understanding that 'safeguarding of children and individuals at risk' is a processing condition that
1341 allows practitioners to share special category personal data. This includes allowing practitioners to
1342 share information without consent where there is good reason to do so, and that the sharing of
1343 information will enhance the safeguarding of a child in a timely manner but it is not possible to gain
1344 consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent
1345 would place a child at risk.
 - 1346 • for schools, not providing pupils' personal data where the serious harm test under the legislation is
1347 met. For example, in a situation where a child is in a refuge or another form of emergency
1348 accommodation, and the serious harms test is met, they must withhold providing the data in

1349 compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in
1350 doubt schools should seek independent legal advice.

1351 6.181. When sharing safeguarding information regarding an individual, staff will need to consider the following:

1352 • Information should only be shared on a 'need to know' basis when it is in the best interests of the
1353 individual

1354 • Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse
1355 or neglect, it may be necessary to override the requirement

1356 • Distinguish fact from opinion

1357 • Ensure you are giving the right information about the right person

1358 • Ensure you are sharing information securely

1359 • Inform the person that the information has been shared if they were not already aware of this and if
1360 it would not create or increase risk of harm to them/others.

1361 6.182. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of
1362 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the
1363 need to safeguard and promote the welfare and protect the safety of children.

1364 6.183. Further details on information sharing can be found in:

1365 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to
1366 information sharing

1367 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young
1368 People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful

1369 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the
1370 department

1371 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity,
1372 including compliance with the GDPR.

1373 6.184. The following wording is to be added to any covering letter where we are sharing documentation:

1374 *"The material contained in this letter and its enclosures are confidential to Cambian Group and the persons
1375 named within the documentation. The documentation is delivered only in accordance with a perceived
1376 legal obligation to make the documentation available and upon the strict understanding that the recipient
1377 and all members of the recipient's staff will undertake to preserve confidentiality and not in any way share
1378 the documentation or any details of the information therein contained with any other party. Any person
1379 receiving this information who breaches these obligations of confidentiality will be held strictly responsible
1380 and will be expected to indemnify Cambian Group and any persons named within the documentation
1381 against any losses that may arise as a result of misuse of this material".*

1382 6.185. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian.

1383 6.186. Failure to follow this policy and local procedure may result in disciplinary action.

1384 **Complaints and Monitoring**

1385 6.187. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**
1386 **procedure**, with reference to the our Designated Safeguarding Officer who is Cassandra Pollitt (DSL) and
1387 BCP Safeguarding Children's Board

1388 **7. Accountability**

1389 7.1. Cassandra Pollitt is the DSL at Cambian Wing College and has lead responsibility for protecting and
1390 safeguarding children, young people and young adults and liaising with the local authority and other local
1391 agencies as appropriate. This includes young person protections, referrals, raising awareness, training,

1392 allocating resources and supporting/directing staff within the Location. In all matters relating to young
1393 person protection and safeguarding Cambian Wing College will follow the procedures outlined in this
1394 policy.

1395 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by
1396 the Head of Service. Our Managing/ Operations Director will undertake a full annual review of the
1397 content and effective application of this policy and associated procedures. The date for the next
1398 scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes in
1399 legislation, regulatory requirements or as a result of best practice guidance.

1400 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director
1401 Compliance, who will support and promote the development of initiatives to improve the prevention,
1402 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is
1403 also responsible for reporting on safeguarding and providing executive leadership.

1404 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those
1405 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can
1406 be stressful and distressing for staff.

1407 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,
1408 allied health professionals and nurses) should understand how their professional standards and
1409 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1410 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level
1411 need to share a common view of what types of behaviour may be abuse or neglect and what should be
1412 an initial response to suspicion or allegation of abuse or neglect.

1413 7.7. All staff MUST make sure that they have familiarised themselves with their local multi-agency
1414 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies
1415 which define the local practice that must be followed.

1416 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable
1417 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact
1418 names and details if required.

1419 **8. Further Safeguarding information – what everyone need to know** 1420 **(Appendix 11)**

1421 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours
1422 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual
1423 and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children

1424 are at risk. Other safeguarding issues such as peer on peer (child on child) abuse all staff should be aware
1425 of are explored in the **Appendix 11. Further Safeguarding information – what everyone need to know.**

1426 **9. Appendices**

1427 **Appendix 1: Relevant policies and documents**

- 1428 **1.** Child Protection and Safeguarding
- 1429 a) 25.01 - Index Form for Individuals Concern File
- 1430 b) 25.02 - Abuse Poster Individual
- 1431 c) 25.03 - Individual Safeguarding booklet – Easy Read
- 1432 d) 25.04 - Concern Form
- 1433 e) 25.05 - Safeguarding Tracking Pack
- 1434 f) 25.06 – Visitor Information Leaflet template
- 1435 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
- 1436 h) 25.08 – Guidance to staff who had an allegation made against them
- 1437 i) 25.09 – Local Safeguarding procedure
- 1438 j) 25.10 – Staff Safeguarding Information poster
- 1439 k) 25.11 – Guidance notes for Designated or On call person
- 1440 l) 25.12 – Static body chart
- 1441 m) 25.13 – Weekly body chart
- 1442 n) 25.14 – Guidance for Investigating Unexplained Body Marks
- 1443 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1444 **2.** Whistleblowing
- 1445 **3.** Anti-bullying
- 1446 **4.** Child Sexual Exploitation
- 1447 **5.** Intimate and Invasive Care
- 1448 **6.** Self-harm and suicide
- 1449 **7.** Behaviour Support
- 1450 **8.** Physical Intervention
- 1451 **9.** Complaints Policy
- 1452 **10.** Health
- 1453 **11.** E –safety
- 1454 **12.** Capacity to consent
- 1455 **13.** Prevent
- 1456 **14.** Recruitment

- 1457 **15.** Code of Conduct
- 1458 **16.** Data Protection
- 1459 **17.** Confidentiality
- 1460 **18.** E- safety
- 1461 **19.** Disciplinary
- 1462 **20.** Complaints
- 1463 **21.** Code of Practice
- 1464 **22.** Mobile telephony
- 1465 **23.** SUI Caretech children's services process
- 1466 **24.** Caretech - Group Leaving Policy
- 1467 **25.** GHR 02 – Harassment and Bullying
- 1468 **26.** GHR 41 – Reference Requests
- 1469 **27.** GHR 41.1 DBS referral log

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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 2021](#)
- [Keeping children safe in education - part one 2021](#)
- [Regulated activity in relation to children: scope](#)
- [What to do if you're worried a child is being abused](#)
- [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- [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)

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Date: September 2021

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DSL– DSL

CSC– Children’s Social Care

CAF – Common Assessment framework

LADO – Local Authority Designated Officer

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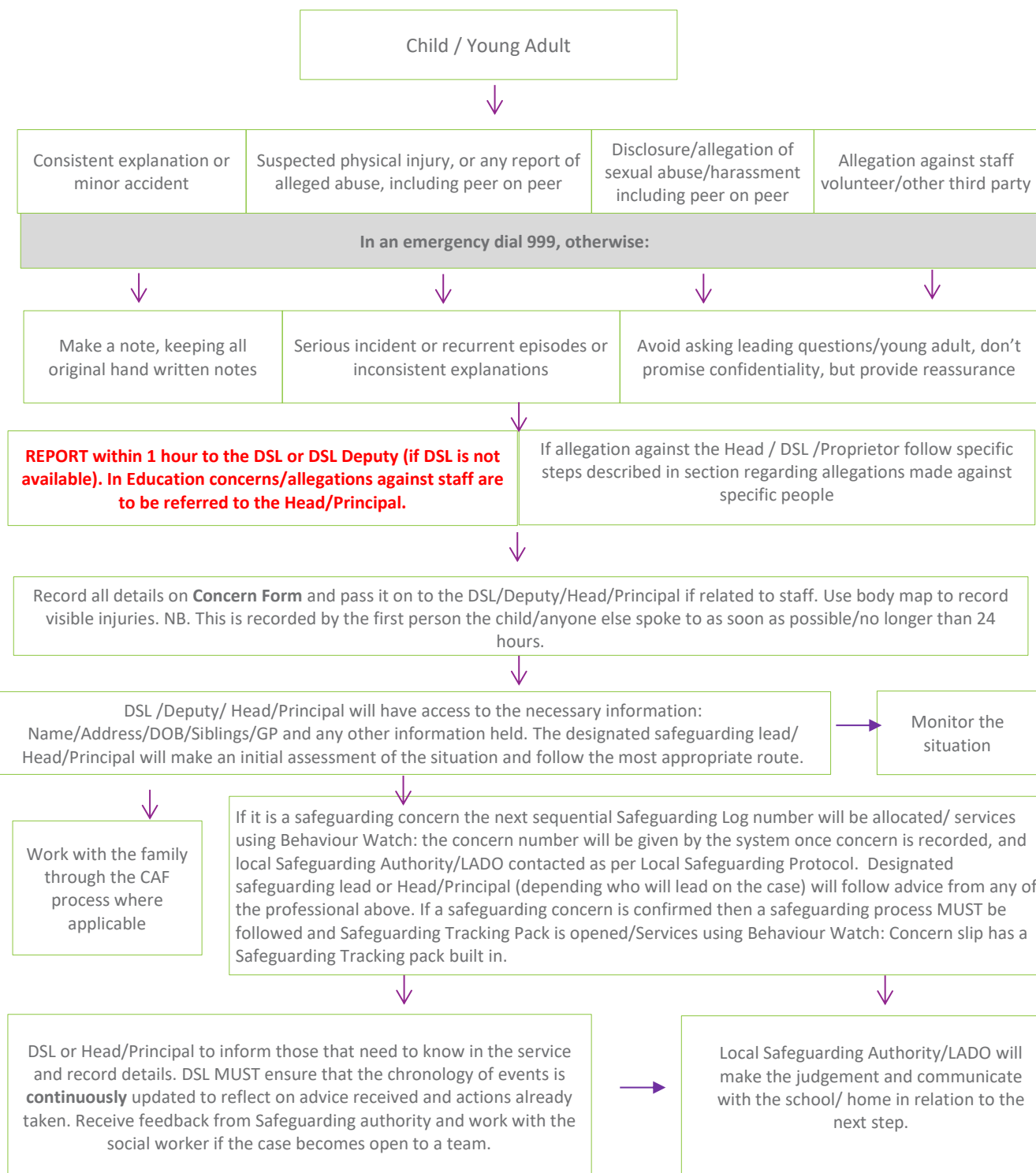
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Appendix 4: Types of abuse – children

Version: 12
Next Review Date: August 2022
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Approved by: P & P Team
Date: September 2021

- 1592 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or
1593 by failing to act to prevent harm. Children may be abused in a family or in an institutional or community
1594 setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or
1595 technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by
1596 another child or children
- 1597 • **Physical abuse:** a form of abuse which may involve hitting, slapping, shaking, throwing, poisoning,
1598 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm
1599 may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in
1600 a child.
- 1601 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse
1602 effects on the child's emotional development. It may involve conveying to a child that they are worthless
1603 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include
1604 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of
1605 what they say or how they communicate. It may feature age or developmentally inappropriate
1606 expectations being imposed on children. These may include interactions that are beyond a child's
1607 developmental capability as well as overprotection and limitation of exploration and learning, or
1608 preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-
1609 treatment of another. It may involve serious bullying (including cyberbullying), causing children
1610 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of
1611 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1612 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example
1613 rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of
1614 clothing. They may also include non-contact activities, such as involving children in the production of
1615 sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children
1616 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the
1617 internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual
1618 abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding
1619 issue (also known as peer on peer abuse) in education and all staff should be aware of it and of their
1620 school or colleges policy and procedures for dealing with it,
- 1621 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an
1622 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child
1623 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or
1624 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence
1625 or the threat of violence. CSE and CCE can affect children, both male and female and can include children
1626 who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual
1627 Exploitation does not always involve physical contact; it can also occur through the use of technology.
- 1628 • **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result
1629 in the serious impairment of the child's health or development. Neglect may occur during pregnancy as
1630 a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
1631 provide adequate food, clothing and shelter (including exclusion from home or abandonment);
1632 protect a child from physical and emotional harm or danger; ensure adequate supervision (including the
1633 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also
1634 include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 1635 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through
1636 social media, online games or other channels of digital communication. Children can also be re-victimised
1637 if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal
1638 abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child
1639 sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual
1640 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using
1641 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that
1642 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as
1643 inappropriate behaviours or content online. For instance, children may be bullied online by their peers
1644 or they might, either accidentally or intentionally, view content which is intended for adults. Both online

1645 abuse and exposure to unsuitable content or behaviour can have a long-lasting impact on the wellbeing
1646 of children and young people.

1647 **Appendix 5: Types of abuse - adults**

- 1648 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling,
1649 scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone
1650 purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding
1651 or withholding food, unauthorized restraint, restricting movement.
- 1652 • **Honour based abuse** - encompasses incidents/crimes which have been committed to protect/defend the
1653 honour of the family and/or the community including female genital mutilation (FGM), forced marriage
1654 and practices such as breast ironing. Abuse committed in the context of preserving “honour” often
1655 involves a wider network of family or community pressure and can include multiple perpetrators. It is
1656 important to be aware of this dynamic and additional risk factors when deciding what form of
1657 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be
1658 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant
1659 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered
1660 HBA.
- 1661 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse
1662 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence
1663 and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour,
1664 violence or abuse between those aged 16 or over who are or have been, intimate partners or family
1665 members regardless of gender or sexuality.
- 1666 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual
1667 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of
1668 the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to,
1669 inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced
1670 use of pornography or witnessing of sexual acts, Indecent exposure.
- 1671 • **Sexual harassment**- unwanted conducts of a sexual nature that can occur online and offline, sexual
1672 harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or
1673 humiliated, and/or create a hostile, offensive or sexualised environment.
- 1674 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing
1675 services, educational and social opportunities and seeing friends, removing mobility or communication
1676 aids or intentionally leaving someone unattended when they need assistance, preventing someone from
1677 meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to
1678 respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,
1679 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a
1680 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1681 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from
1682 accessing their own money, benefits or assets, employees taking a loan from a person using the service,
1683 undue pressure, duress, threat or undue influence put on the person in connection with loans, wills,
1684 property, inheritance or financial transactions, arranging less care than is needed to save money to
1685 maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to
1686 access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in
1687 a family home, someone moving into a person’s home and living rent free without agreement or under
1688 duress, false representation, using another person's bank account, cards or documents, exploitation of a
1689 person’s money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy,
1690 appointeeship or other legal authority.
- 1691 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as
1692 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that
1693 realistically they never will be able to.
- 1694 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and
1695 civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as
1696 ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks or
1697 inappropriate use of language related to a protected characteristic, denying access to communication
1698 aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on
1699 the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and

- 1700 criminal justice relating to a protected characteristic, substandard service provision relating to a
1701 protected characteristic.
- 1702 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-
1703 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and
1704 supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful
1705 attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and
1706 privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or
1707 assistance with eating, not offering choice or promoting independence, misuse of medication, failure to
1708 provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious
1709 or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence
1710 or communication, failure to respond to complaints.
 - 1711 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,
1712 stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure
1713 to administer medication as prescribed, refusal of access to visitors, not taking account of individuals'
1714 cultural, religious or ethnic needs, not taking account of educational, social and recreational needs,
1715 ignoring or isolating the person, preventing the person from making their own decisions, preventing
1716 access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
 - 1717 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of
1718 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,
1719 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise
1720 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more
1721 appropriate under the parts of the Care Act dealing with assessment, planning, information and advice,
1722 and prevention.
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Appendix 6: Signs that someone could be a victim

Physical abuse

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

Sexual abuse

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

Psychological or emotional abuse

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

Neglect and acts of omission

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

1772 Unsuitable clothing or not enough clothes

1773

1774 **Domestic abuse**

- 1775 • becoming anxious or depressed
- 1776 • having difficulty sleeping
- 1777 • complaining of physical symptoms such as tummy aches
- 1778 • starting to wet their bed
- 1779 • behaving as though they are much younger than they are
- 1780 • having problems with school
- 1781 • becoming aggressive or they may internalise their distress and withdraw from other people
- 1782 • having a lowered sense of self-worth
- 1783 • older children may begin to play truant or start to use alcohol or drugs
- 1784 • they beginning to self-harm by taking overdoses or cutting themselves

1785

1786 **Peer on Peer abuse**

- 1787 • absence from school or disengagement from school activities
- 1788 • physical injuries
- 1789 • mental or emotional health issues
- 1790 • becoming withdrawn – lack of self esteem
- 1791 • lack of sleep
- 1792 • alcohol or substance misuse
- 1793 • changes in behavior
- 1794 • inappropriate behavior doe age
- 1795 • abusive towards others

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Appendix 7: Signs that someone could be an abuser

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

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1874 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**
1875 **and recording procedure**

1876 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1
1877 hour from the moment of disclosure/report from the child/young person/other person, completes and
1878 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of
1879 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern is
1880 related to the staff and the Head/Principal is not available, staff must report their concern to the DSL
1881 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal
1882 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally before
1883 completing the Concern/Safeguarding slip in the system.

1884 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details
1885 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on
1886 the Concern Form. Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the
1887 concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened
1888 (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).

1889 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or
1890 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on
1891 the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and
1892 immediately (or at least within one hour of receiving the concern form, make a referral to the local
1893 Safeguarding Authority and the Local Authority Designated Officer (LADO) where required, to discuss the
1894 allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the Behaviour Watch
1895 system will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible
1896 to the Safeguarding Team.

1897 • If the local Safeguarding Authority/LADO confirms that they do not consider the matter to be a
1898 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the
1899 Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal
1900 Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their
1901 Senior Management Team is assigned to look into the concern. The review must be recorded and
1902 outcomes shared with the people involved. Feedback from the review session MUST be provided to local
1903 Safeguarding Authority/LADO. Services using the Behaviour Watch system will follow the same set of
1904 steps apart from populating the Central Log of Concerns and Safeguarding as the log can be generated
1905 by the system using chosen filtering criteria.

1906 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken.
1907 This diligent approach will ensure a clear historic record of contact with local Safeguarding
1908 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with
1909 the local Safeguarding Authority/LADO whichever appropriate.

1910 • If the local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it
1911 requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must
1912 be opened with the next sequential Safeguarding Reference included on the form and details as such
1913 entered on the central log.

1914 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking Pack
1915 being opened, a one record will be created including the original concern, with the whole document
1916 having the same slip number.

1917 • Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the
1918 **Responsible/Nominated Individual and** in day schools - **Regional Education Manager** as a follow up to
1919 the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual**
1920 **and Regional Education Manager** on completion, providing detailed overview of the actions taken and
1921 the final outcome. Services using the Behaviour Watch will be able to trigger live notification to the
1922 Regional Manager (Education/Care), Responsible/Nominated Individual and Registered Manager – where
1923 appropriate. The **Responsible/Nominated Individual and Regional Education Manager** in day schools

- 1924 will update relevant Directors. This original form will be saved in the Safeguarding file/Behaviour Watch
1925 – Concern/SG module.
- 1926 • In the case of serious harm, and/or the child/young person or young adult is in immediate danger the
1927 local Police should be informed immediately as well and they can take immediate protective action as
1928 necessary.
- 1929 • If the matter is a more general concern then ensure that the 'Action Taken' log on the concern form is
1930 completed and the form is filed within the Safeguarding file. Either way the form must be signed by the
1931 DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use
1932 Concern/Safeguarding 'Other' slip to record concerns which are not related to children/young people,
1933 staff or children/young people and staff.
- 1934 • The relevant concern form should be referenced in the Individual's **25.01 Index form for Individual**
1935 **concern/safeguarding file** and the site's **25.07 Central Log of Concerns and Safeguarding**. Services using
1936 Behaviour Watch will be able to filter information per chosen criteria and also generate reports per each
1937 child/young person in the school, college, children's or care homes.
- 1938 • All information relating to the Safeguarding concern is recorded on the **25.05 Safeguarding Tracking Pack**
1939 **/Behaviour Watch Concern/SG module**.
- 1940 • The Safeguarding Concern will remain open until local Safeguarding Authority/LADO have confirmed in
1941 writing that the concern is closed and Responsible/Nominated Individual and Regional Education
1942 Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is
1943 completed in full and can be closed. **The Safeguarding will remain open until both elements of sign-off**
1944 **have been completed.** Once the Safeguarding tracking Pack is signed, it **MUST** be filed in the Safeguarding
1945 **file.**
- 1946 • If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local
1947 Authority and/or the police. The individual can be kept in their care home or on the school/college site
1948 fully supported (e.g. if they are a day student) if advised to do so.
- 1949 • The parent/carers should be informed and a decision should be made with the Local Authority and the
1950 Police about what action is to be taken and whom by.
- 1951 • If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been
1952 said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an
1953 abuse referral but may help to clarify the situation but they must record all details of any conversation
1954 and advice received on a concern form. He/she can then move to a formal referral or actively monitor
1955 the situation.
- 1956 • The local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or
1957 allegation of abuse directed against anyone working within the establishment. The establishment **MUST**
1958 not internally investigate any allegations of abuse without first taking instruction from the local
1959 Safeguarding Authority/LADO.
- 1960 • Once agreed by local Safeguarding Authority/LADO that the provider can commence the internal
1961 management investigation (level 2), the investigation process will commence.
- 1962 • Once agreed by local Safeguarding Authority/LADO that the investigation will be completed by the
1963 external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to
1964 assist the external agency to ensure the investigation is completed without a delay.
- 1965 • Registered Manager **MUST** notify relevant regulator by submitting specific statutory notification within
1966 the time frame specified by their regulator. This is regardless of who leads on the investigation and
1967 whether or not the investigation has been concluded.
- 1968 • If as the result of an investigation there has been a substantiated allegation against a member of staff,
1969 we will work with the local Safeguarding Authority/LADO to determine whether there are any
1970 improvements to be made to our safeguarding policy, procedures and practice to prevent similar events

1971 in the future. Also we will work with our internal Human Resources department and may commence
1972 proceedings under **GHR 27. Disciplinary policy and procedure.**

- 1973 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.
1974 Records are kept of all conversations as part of the investigation process and made available as
1975 required.

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Appendix 9: Key contacts

Designated Safeguarding Lead (DSL) is Cassandra Pollitt

Telephone (24hrs): 07525629529 **Email:** Cassandra.Pollitt@cambianguroup.com

Deputy Designated Safeguarding Lead is Louise Sattin/Magdalena Lawrence/Chelsea Hicks

Telephone(24hrs): 07860752304/01202635630

Email: Louise.Sattin@cambianguroup.com/magdalena.lawrence@cambianguroup.com/Chelsea.hicks@cambianguroup.com

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

Telephone (24hrs): 07525629529 **Email:** Cassandra.Pollitt@cambianguroup.com

Headteacher is Cassandra Pollitt

Telephone (24hrs): 07525629529 **Email:** Cassandra.Pollitt@cambianguroup.com

Managing Director of Education is Andrew Sutherland

Telephone (24hrs): 01415872710 **Email:** Andrew.Sutherland@cambianguroup.com

Directorate (Education or Residential Services)

Safeguarding lead for Residential Services is Helen Hoggins CEO Children's Services)

Telephone: 07525632252 **Email:** helen.hoggins@cambianguroup.com

Group

The Proprietor of the Young people's/care home is The Cambian Group. The Proprietor's representative is John Ivers (CEO Children's Services).

Telephone: 02087356150 **Email:** John.Ivers@caretech-uk.com

Local authority

BCP Local Authority & BCP Safeguarding Children's Board

Telephone: 01202 123334 / 01202 738256 (Out of Hours)

BCP Local Authority & Insert Local Safeguarding Adults' Board

Telephone: 01202 123654 / 0300 123 9895 (Out of Hours)

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

Outside of office hours

0300 1239895

The non-emergency police telephone number is: 101.

For young people under the age of 18:

The Local Authority Designated Officer (LADO) is

2069
2070 Telephone: 01202 456744 (Office hours: Monday-Friday 9am-5pm. Outside of office hours/weekends, the emergency
2071 duty team can be contacted on: 01202 738 256).

2072
2073 **Local Safeguarding Children Partners/ Local Safeguarding Adult's Board**

2074 The name, address and contact details for the Local Safeguarding Board is as follows:

2075
2076 **Address:** BCPSAB, c/o Adult Social Care - Services,
2077 Room 1,
2078 Civic Centre,
2079 Pole
2080 15 2RT

2081
2082 **Telephone (24hrs):** 01202 261015

Email: bcpsafeguardingadultsboard@bcpcouncil.gov.uk

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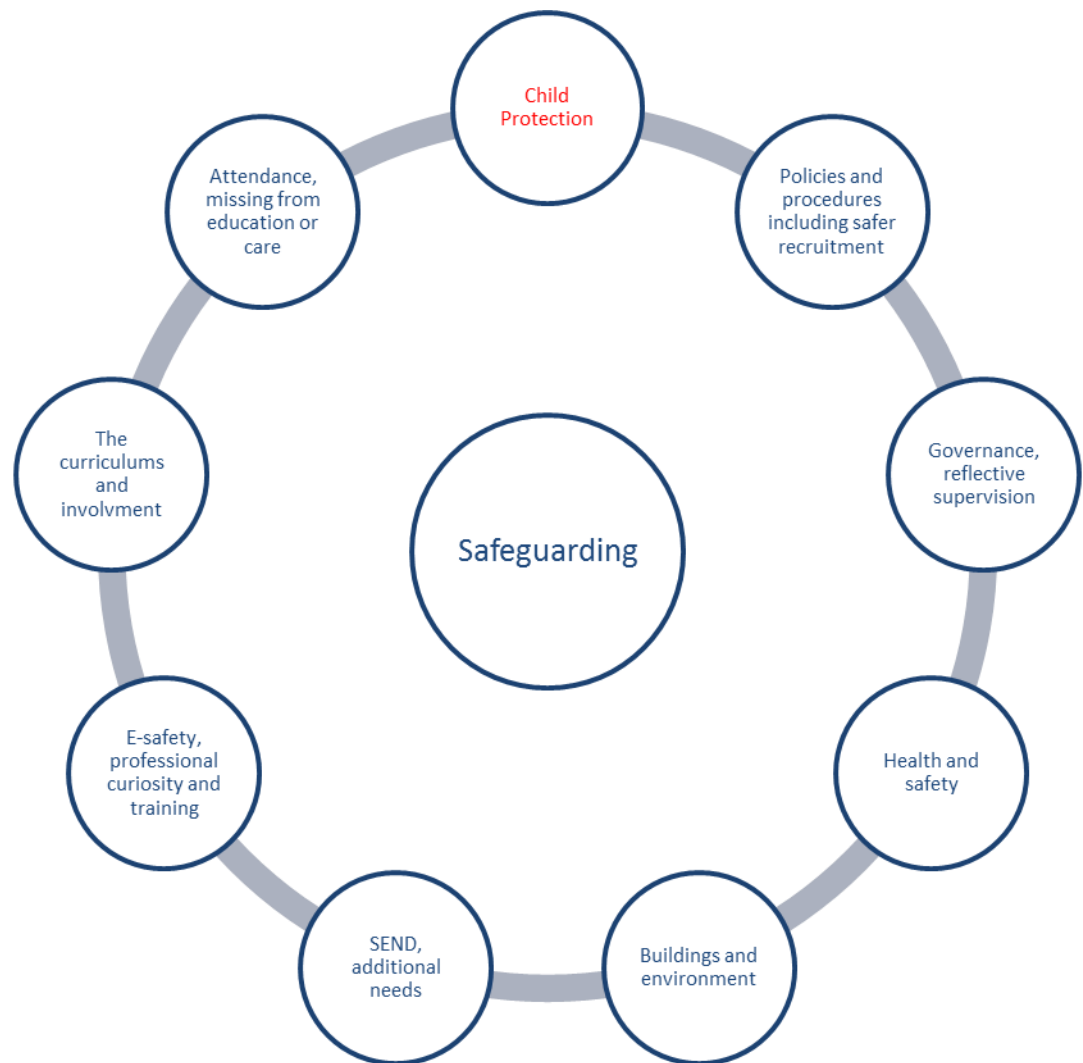
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Appendix 10. Safeguarding in children's Services - illustration



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

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Contextual safeguarding

9.1. 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, children’s/care homes and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra- familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts’.

9.2. 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 DSL (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 (KCSiE2021). Further 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](#)

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

9.4. 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.

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

2173

Bullying

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

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Peer on peer (child on child) abuse

9.7. Boarding schools, residential special schools, residential colleges and children’s homes and care homes for young adults attending education (FE colleges) have additional factors to consider with regard to safeguarding. Schools and colleges that provide such residential accommodation and/or are registered as children’s homes should be alert to signs of abuse in such settings (for example, inappropriate pupil or student relationships and the potential for peer on peer abuse, particularly in schools and colleges where there are significantly more girls than boys or vice versa) and work closely with the host local authority and, where relevant, any local authorities that have placed their children there. All residential setting within the Organisation children’s service will continuously maintain their communication with the

- 2188 internal and external Education providers to ensure the additional factors are being considered and any
2189 concerns shared in a timely manner and with the right people.
- 2190 9.8. All staff should be aware that children can abuse other children (often referred to as peer on peer abuse)
2191 and that it can happen both inside and outside of school/college/children's/care home and online. It is
2192 important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify
2193 it and respond to reports. In some schools, colleges, children's / care homes site – based or regional
2194 members of therapy teams might need to be involved and support the SLT to identify the most effective
2195 ways of communication with the child/young person who may have potentially been the victim of Peer
2196 on Peer abuse and who instigated it.
- 2197 9.9. It must be recognised that children and young people would require varied approaches and
2198 communication mechanisms to be present and available so they can report abuse. Children must be
2199 regularly reassured that their concern/reports will be treated seriously every time they report it.
- 2200 9.10. Children needs to be told what will happen from the moment their concern is shared, so the lack of
2201 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.
2202 Children need to know that that their concerns will be investigated and dealt with. Child's/young person's
2203 preference in terms of how feedback should be provided must be taken into consideration so this can be
2204 planed for in advance.
- 2205 9.11. The communication with each child throughout the process of Peer on peer abuse investigation must be
2206 regular, proportionate and take place using suitable communication.
- 2207 9.12. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't
2208 receive timely and appropriate support from the school/college, hence the communication and support

- 2209 must become one of the critical points of a significant priority to those responding to and those managing
2210 peer on peer abuse cases including those of a sexual nature. Other consideration for all providers were:
- 2211 • to assume it is happening here and plan accordingly
 - 2212 • work on and strengthen the whole school, college, children's/care home approach to developing
2213 a safeguarding culture
 - 2214 • to ensure staff model respectful behaviour
 - 2215 • to ensure children and young people are clear about acceptable and unacceptable behaviour
 - 2216 • to ensure children/young people are confident to ask for help
 - 2217 • to ensure carefully planned and implemented RSHE curriculum
 - 2218 • to ensure the behavioural approach with sanctions & interventions for poor behaviour
 - 2219 • to have mechanisms to support students who need it in the way they need it
 - 2220 • to ensure staff have access to suitable training & that there are clear expectation for staff and
2221 Managers
 - 2222 • to ensure pupil's voice is heard and responded to
 - 2223 • to ensure DSLs have some protected time to engage with local safeguarding partners and LADOs,
2224 so those relationships can be strengthened
 - 2225 • to ensure staff follow the guidance in Keeping Children Safe in Education
2226
- 2227 9.13. All staff should understand, that even if there are no reports in their schools or colleges it does not mean
2228 it is not happening, it may be the case that it is just not being reported. As such it is important if staff
2229 have any concerns regarding peer on peer abuse they should speak to their DSL (or deputy).
- 2230 9.14. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and
2231 harassment. Staff must NOT take the view that it doesn't happen in their setting. It is essential that
2232 all staff understand the importance of challenging inappropriate behaviours between peers, many of
2233 which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example
2234 dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being
2235 boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst

2236 case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming
2237 forward to report it.

2238 9.15. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but that
2239 all peer on peer abuse is unacceptable and will be taken seriously. It is essential that all victims are
2240 reassured that they are being taken seriously and that they will be supported and kept safe.

2241 9.16. Peer on peer abuse is most likely to include, but may not be limited to:

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- 2243 • bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- 2244 • abuse in intimate personal relationships between peers
- 2245 • physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
2246 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 2247 • sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
2248 element which facilitates, threatens and/or encourages sexual violence). For further information about
2249 sexual violence see [Annex B.](#)
- 2250 • sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may
2251 be standalone or part of a broader pattern of abuse; For further information about sexual harassment
2252 see [Annex B.](#)
- 2253 • causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
2254 themselves sexually, or to engage in sexual activity with a third party
- 2255 • consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as
2256 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance:
2257 [Sharing nudes and semi-nudes advice for education settings.](#)
- 2258 • Upskirting (For further information about upskirting see Annex B) which typically involves taking a
2259 picture under a person's clothing without their permission, with the intention of viewing their genitals
2260 or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

2261 9.17. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or
2262 humiliation used as a way of initiating a person into a group and may also include an online element)

2263 9.18. Staff must be clear as to the school/college's/home's procedures with regards to peer on peer abuse and
2264 the important role they have to play in preventing it and responding where they believe a child may be
2265 at risk from it.

2266 9.19. All Individuals will be provided with safeguarding information in a format which is appropriate for their
2267 understanding and communication. This may take the form of posters or a leaflet/booklet.

2268 9.20. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing
2269 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be
2270 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.
2271 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or
2272 acceptable. However, it is critical to state that some children with cognitive impairment may not be able
2273 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will
2274 work with each of the children affected by the situation in order to enhance their understanding of the
2275 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

2276 Serious violence

2277

2278 9.21. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with
2279 serious violent crime. These may include increased absence from school, a change in friendships or
2280 relationships with older individuals or groups, a significant decline in performance, signs of self-harm or
2281 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new

- 2282 possessions could also indicate that children have been approached by, or are involved with, individuals
2283 associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 2284 9.22. All staff should be aware of the range of risk factors which increase the likelihood of involvement in
2285 serious violence, such as being male, having been frequently absent or permanently excluded from
2286 school, having experienced child maltreatment and having been involved in offending, such as theft or
2287 robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and
2288 gang involvement and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).
- 2289 9.23. Sexual violence and sexual harassment between children can occur between two children of **any age and**
2290 **sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur through
2291 a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2292 9.24. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful
2293 and distressing. This will, in all likelihood, adversely affect their educational attainment and will be
2294 exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same
2295 children's/care home. Sexual violence and sexual harassment exist on a continuum and may overlap, they
2296 can occur online and face to face (both physically and verbally) and are never acceptable. All staff working
2297 with children are advised to maintain an attitude of 'it could happen here'.
- 2298 9.25. It is essential that all victims are reassured that they are being taken seriously and that they will be
2299 supported and kept safe. **A victim should never be given the impression that they are creating a problem**
2300 **by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed
2301 for making a report.
- 2302 9.26. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that
2303 victims are protected, offered appropriate support and every effort is made to ensure their education is
2304 not disrupted. It is also important that other children, adult students and school and college staff are
2305 supported and protected as appropriate.
- 2306 9.27. There is support available for schools and colleges. Paragraph 52 and Annex A in the [Sexual Violence](#)
2307 [and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed information
2308 and links to resources.
- 2309 9.28. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with
2310 special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2311 9.29. Staff should be aware of the importance of:
- 2312 • challenging inappropriate behaviours;
 - 2313 • making clear that sexual violence and sexual harassment is not acceptable, will never be
2314 tolerated and is not an inevitable part of growing up;
 - 2315 • not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing
2316 up", "just having a laugh" or "boys being boys"; and
 - 2317 • challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms,
2318 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or
2319 tolerating such behaviours risks normalising them.
- 2320 9.30. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to
2321 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is
2322 developmentally inappropriate and may cause developmental damage. An umbrella term for these types
2323 of behaviour are often referred to as **"harmful sexual behaviour"**. The term has been widely adopted in
2324 child protection. Harmful sexual behaviour can occur online and/or offline and can also occur
2325 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection
2326 context.
- 2327 9.31. Situations where children/young people are forced or coerced into sexual activity by peers or associates
2328 can be related with gang / serious youth violence activity but that is not always the case. Peer influence

2329 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many
2330 young people see it as a “way out” from their day to day life and feel a strong bond with their peers, one
2331 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying
2332 include:

2333 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that
2334 makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their
2335 colour, ethnicity, culture, faith community, national origin or national status.

2336 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender
2337 is used as a weapon by boys or girls, this may also include any of the following:

- 2338 - spreading rumors about someone's alleged sex life
- 2339 - using offensive terms to describe a person
- 2340 - inappropriate touching or attempts to do so
- 2341 - non-consensual sharing of sexual images and videos
- 2342 - unwanted sexual comments and messages, including those on social media
- 2343 - any sexual exploitation, coercion and threats
- 2344 - sexual assault and rape

2345 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or knowledge,
2346 with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual
2347 gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any
2348 gender, can be a victim The Voyeurism Offences Act, which was commonly known as the Upskirting
2349 Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.

2350 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are transgender,
2351 thought to be transgender, or whose gender expression doesn’t conform to traditional gender roles.
2352 Transphobia can prevent transgender and gender nonconforming people from living full lives free
2353 from harm.

2354 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual
2355 orientation);

2356 • **Disablist Bullying** - targets a young person solely based on their disability. This can include
2357 manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a
2358 certain aspect of the victim’s disability.

2359 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect attitude (usually
2360 negative) towards an individual based solely on the individual's membership of a social group. For
2361 example, a person may hold prejudiced views towards a certain race or gender etc. (e.g.

2362 sexist). **Discrimination** is the behavior or actions, usually negative, towards an individual or group of
2363 people, especially on the basis of sex/race/social class.

2364 9.32. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE2021/Annex B](#)
2365 (pages 139 – 140) and more details about how to respond have been included in [KCSIE 2021 Part 5. Child](#)
2366 [on child sexual violence and sexual harassment](#).

2367 **What staff should do if they have concerns about the child/young person**

2368 9.33. Staff working with children/young people are advised to maintain an attitude of ‘it could happen here’
2369 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff
2370 should always act in the best interests of the child/young person

2371 9.34. If staff have any concerns about a child’s/young person welfare, they should act on them immediately by
2372 following this procedure and reporting their concern to the DSL/DSL Deputy.

2373 **Opportunities to teach safeguarding**

2374 9.35. Governing bodies and proprietors should ensure that, as part of the requirement for staff to undergo
2375 regular updated safeguarding training, including online safety and the requirement to ensure children
2376 are taught about safeguarding, including online safety, that safeguarding training for staff, including
2377 online safety training, is integrated, aligned and considered as part of the whole school or college
2378 safeguarding approach and wider staff training and curriculum planning.

2379 9.36. Whilst considering the above training requirements, governing bodies and proprietors should have
2380 regard to the [Teachers’ Standards](#) which set out the expectation that all teachers manage behaviour
2381 effectively to ensure a good and safe educational environment and requires teachers to have a clear
2382 understanding of the needs of all pupils.

2383 9.37. Governing bodies and proprietors should ensure that children are taught about safeguarding, including
2384 online safety, and recognise that a one size fits all approach may not be appropriate for all children, and
2385 a more personalised or contextualised approach for more vulnerable children, victims of abuse and some
2386 SEND children might be needed.

2387 9.38. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may
2388 cover relevant issues through tutorials). This may include covering relevant issues for schools through
2389 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary
2390 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found
2391 here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health](#)
2392 [education](#).

2393 9.39. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:
2394 Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics

2395 and non-statutory implementation guidance. The following resources may also help schools and colleges
2396 understand and teach about safeguarding:

- 2397 • DfE advice for schools: [teaching online safety in schools](#);
- 2398 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
- 2399 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with](#)
2400 [children and young people](#);
- 2401 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum
2402 impact of any online safety sessions delivered by external visitors;
- 2403 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2404 • Public Health England: [Rise Above](#)

2405 9.40. As schools and colleges increasingly work online, it is essential that children are safeguarded from
2406 potentially harmful and inappropriate online material. Whilst it is essential that governing bodies and
2407 proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful
2408 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with
2409 regard to online teaching and safeguarding.

2410 Online safety

2411 9.41. It is essential that children are safeguarded from potentially harmful and inappropriate online material.
2412 An effective whole school and college approach to online safety empowers a school or college to protect
2413 and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,
2414 intervene in, and escalate any concerns where appropriate.

2415 9.42. The breadth of issues classified within online safety is considerable, but can be categorised into four areas
2416 of risk which we'll refer to as 4Cs later on:

- 2417 • **content:** being exposed to illegal, inappropriate or harmful content, for example:
2418 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation
2419 and extremism.
- 2420 • **contact:** being subjected to harmful online interaction with other users; for example: peer
2421 to peer pressure, commercial advertising and adults posing as children or young adults with
2422 the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2423 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for
2424 example, making, sending and receiving explicit images (e.g consensual and non-
2425 consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit
2426 images and online bullying; and
- 2427 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or
2428 financial scams. If you feel your pupils, students or staff are at risk, please report it to the
2429 Anti-Phishing Working Group <https://apwg.org/>

2430 9.43. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and
2431 implementing policies and procedures. This will include considering how online safety is reflected as
2432 required in all relevant policies and considering online safety whilst planning the curriculum, any teacher
2433 training, the role and responsibilities of the DSL and any parental engagement.

2434 Online safety policy

2435 9.44. Online safety and the school or college’s approach to it should be reflected in the child protection policy.
2436 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college
2437 should have a clear policy on the use of mobile and smart technology. Amongst other things this will
2438 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone

2439 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually
2440 harass their peers via their mobile and smart technology, share indecent images: consensually and non-
2441 consensually (often via large chat groups), and view and share pornography and other harmful content.
2442 Schools and colleges should carefully consider how this is managed on their premises and reflect in their
2443 mobile and smart technology policy and their child protection policy.

2444 9.45. Information and support available to schools and colleges to keep children safe online can be found in
2445 [KCSIE 2021 Annex D](#).

2446 Remote Learning

2447 9.46. Where children are being asked to learn online at home the Department has provided advice to support
2448 schools and colleges do so safely: [Schools Covid-19 operational guidance](#) (this covers Remote education)
2449 and [safeguarding and remote education](#). The NSPCC and PSHE Association also provide helpful advice:

- 2450 • NSPCC Learning - [Undertaking remote teaching safely during school closures](#)
- 2451 • PSHE - [PSHE Association coronavirus hub](#)

2452 Filters and monitoring

2453 9.47. Whilst considering their responsibility to safeguard and promote the welfare of children and provide
2454 them with a safe environment in which to learn, governing bodies and proprietors should be doing all
2455 that they reasonably can to limit children's exposure to the above risks from the school's or college's IT
2456 system. As part of this process, governing bodies and proprietors should ensure their school or college
2457 has appropriate filters and monitoring systems in place. Governing bodies and proprietors should
2458 consider the age range of their children, the number of children, how often they access the IT system and
2459 the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and
2460 seek advice and support required.

2461 9.48. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges
2462 and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK Safer Internet
2463 Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer
2464 Internet Centre: [appropriate filtering and monitoring](#).

2465 Information security and access management

2466 9.49. Education settings are directly responsible for ensuring they have the appropriate level of security
2467 protection procedures in place, in order to safeguard their systems, staff and learners and review the
2468 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
2469 Guidance on e-security is available from the National Education Network. In addition, broader guidance
2470 on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.

2471 Reviewing online safety

2472 9.50. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should
2473 consider carrying out an annual review of their approach to online safety, supported by an annual risk
2474 assessment that considers and reflects the risks their children face. A free online safety self-review tool
2475 for schools can be found via the [360 safe website](#).

2476 9.51. UKCIS has published [Online safety in schools and colleges: Questions from the governing board](#). The
2477 questions can be used to gain a basic understanding of the current approach to keeping children safe
2478 online; learn how to improve this approach where appropriate; and find out about tools which can be
2479 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of

2480 trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development
2481 and monitoring.

2482 Information and support

2483 9.52. There is a wealth of additional information available to support schools, colleges and parents to keep
2484 children safe online. A sample is provided at [Annex D](#) (page 152 – 154).

2485 Cyberbullying

2486 9.53. Central to Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all
2487 children/young people have a right not to be bullied’. School/colleges also recognises that it must take
2488 note of bullying perpetrated outside school/college which spills over into the school/college; therefore
2489 once aware services will respond to any cyber-bullying we become aware of carried out by
2490 children/young people when they are away from the site.

2491 9.54. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using
2492 electronic forms of contact repeatedly over time against a victim who cannot easily defend
2493 himself/herself.’

2494 • By cyber-bullying, we mean bullying by electronic media:

2495 • Bullying by texts or messages or calls on mobile ‘phones

2496 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2497 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,
2498 personal websites, social networking sites

2499 • Using e-mail to message others

2500 • Hijacking/cloning e-mail accounts

2501 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2502 9.55. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory
2503 information in any media including internet sites.

2504 9.56. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public
2505 electronic communications network, a message or other matter that is grossly offensive or one of an
2506 indecent, obscene or menacing character.

2507 9.57. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct
2508 amounting to harassment.

2509 9.58. If services become aware of any incidents of cyberbullying, they will need to consider each case
2510 individually as to any criminal act that may have been committed. The services will pass on information
2511 to the police if it feels that it is appropriate or is required to do so.

2512 Gaming – raising awareness

2513 9.59. Online gaming is an activity in which the majority of children and young people and many adults get
2514 involved. The services will raise awareness by talking to children/young people/key workers/staff and
2515 also where appropriate parents/carers involved about the games their children play and help them
2516 identify whether they are appropriate.

2517 Nudes/semi nudes images or videos

2518 9.60. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others,
2519 or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any

2520 device that enables the sharing of media and messages. Sexting may also be called: trading nudes, dirties,
2521 pic for pic.

2522 9.61. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the
2523 person doing it is a child. A young person is breaking the law if they:

- 2524 • take an explicit photo or video of themselves or a friend
- 2525 • share an explicit image or video of a child, even if it's shared between children of the same age
- 2526 • possess, download or store an explicit image or video of a child, even if the child gave their permission
2527 for it to be created.

2528 9.62. However, if a young person is found creating or sharing images, the police can choose to record that a
2529 crime has been committed but that taking formal action isn't in the public interest. There are many
2530 reasons why a young person may want to send a naked or semi-naked picture, video or message to
2531 someone else:

- 2532 • joining in because they think that 'everyone is doing it'
- 2533 • boosting their self-esteem
- 2534 • flirting with others and testing their sexual identity
- 2535 • exploring their sexual feelings
- 2536 • to get attention and connect with new people on social media
- 2537 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person
2538 asking is persistent

2539 9.63. The risks of sexting are that the young person has no control over the images and how these are shared,
2540 and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide
2541 education and guidance to prevent individuals from becoming victims of such situations by encouraging
2542 them to think about the risk of sexting and understand how to seek help when approached to take part
2543 in sexting. More information can be found on: [Keeping-children-safe/online-safety/sexting-sending-](https://www.cambian.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes)
2544 [nudes](https://www.cambian.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes).

2545 Online reputation

2546 9.64. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed
2547 by posts, photos that have been uploaded and comments made by others on people's profiles. It is
2548 important that children/young people and staff are aware that anything that is posted could influence
2549 their future professional reputation. The majority of organisations and work establishments now check
2550 digital footprint before considering applications for positions or places on courses.

2551 Grooming

2552 9.65. On-line grooming is the process by which one person with an inappropriate sexual interest in
2553 children/young people will approach a child/young person on-line, with the intention of developing a

2554 relationship with that child/young person, to be able to meet them in person and intentionally cause
2555 harm.

2556 9.66. The services will build awareness amongst children/young people, parents/carers and staff about
2557 ensuring that the child/young person:

2558 • Only has friends on-line that they know in real life

2559 • Is aware that if they communicate with somebody that they have met on-line, that relationship should
2560 stay on-line.

2561 9.67. Where appropriate that the services will support parents/carers to:

2562 • Recognise the signs of grooming

2563 • Have regular conversations with their children/young people about on-line activity and how to stay
2564 safe on-line

2565 9.68. Where appropriate the services will raise awareness by:

2566 • Regular communication with the families

2567 • Schools/colleges will include awareness around grooming as part of their curriculum

2568 • Identifying with the families and children/young people how they can be safeguarded against
2569 grooming.

2570 **Violence against women and girls (VAWG)**

2571 9.69. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women
2572 and girls. The government has a strategy looking at specific issues that women and girls face.

2573 9.70. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to
2574 equal participation of women and men in social, economic, and political spheres. Such violence impedes
2575 gender equality and the achievement of a range of development outcomes. VAWG is a complex and
2576 multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention
2577 of and response to such violence require coordinated action across multiple sectors.
2578

2579 **Female genital mutilation (FGM)**

2580 9.71. FGM comprises all procedures involving partial or total removal of the external female genitalia or other
2581 injury to the female genital organs for non-medical reasons, hence interferes with the natural function of
2582 girls' and women's bodies. It has no health benefits and harms girls and women in many ways.

2583 9.72. The age at which girls undergo FGM varies enormously according to the community in which they live.
2584 The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before
2585 marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place
2586 between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

2587 9.73. In 2003 FGM became a criminal offence for UK nationals or permanent UK residents to take their child
2588 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty
2589 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

2590 **Forced marriage**

2591 9.74. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses
2592 cannot consent to the marriage and duress is involved. Duress can include physical, psychological,

2593 financial, sexual and emotional pressure.’ In developing countries approx. 11% of girls are married before
2594 the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2595 9.75. It is important that all members of staff recognise the presenting symptoms, know how to respond if
2596 there are concerns and where to turn for advice.

2597 9.76. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**
2598 and locally through the local police safeguarding team or children’s social care.

2599 9.77. While all members of staff (education, care, clinical) have important responsibilities with regard to
2600 children, young people or adults who may be at risk of forced marriage, managers and leaders should not
2601 undertake roles in this regard that are most appropriately discharged by other children’s services
2602 professionals such as police officers or social workers.

2603 **Breast ironing**

2604 9.78. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's
2605 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically
2606 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and
2607 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue
2608 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where
2609 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports
2610 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used
2611 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2612 9.79. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and
2613 Safeguarding policy and the Individual offered medical help.

2614 **Teenage relationship abuse**

2615 9.80. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such as
2616 controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them
2617 what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen
2618 relationships.

2619 9.81. Further research shows that teenagers don’t understand what consent means within their relationships.
2620 They often hold the common misconception that rape can only be committed by a stranger down a dark
2621 alley and don’t understand that it could happen within their own relationships. This can lead to these
2622 abusive behaviours feeling ‘normal’ and therefore unchallenged as they are not recognised as being
2623 ‘abusive’.

2624 9.82. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their
2625 own, their peers or others behaviour towards them. Therefore significant effort will be made to raise
2626 awareness of it and respond effectively to such situations.

2627 9.83. In response to this Cambian Group will provide education and guidance to prevent teenagers from
2628 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of
2629 violence, abuse and controlling behaviours, and understand what consent means within relationships.

2630 **Honour-based violence**

2631 9.84. It is often linked to family members or acquaintances who mistakenly believe someone has brought
2632 shame to their family or community by doing something that is not in keeping with the traditional beliefs
2633 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider
2634 network of family or community pressure and can include multiple perpetrators. It is important to be

2635 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take”
2636 for example, honour-based violence might be committed against individuals who:

- 2637 • become involved with a boyfriend or girlfriend from a different culture or religion
- 2638 • want to get out of an arranged marriage
- 2639 • want to get out of a forced marriage
- 2640 • wear clothes or take part in activities that might not be considered traditional within a particular
- 2641 culture.

2642 9.85. Girls and women are the most common victims of honour-based violence however it can also affect men
2643 and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’
2644 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced
2645 marriage, being held against their will or taken somewhere they don’t want to go.

2646 9.86. If staff believe that the Individual is at risk from honour-based violence the DSL will follow the usual
2647 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is
2648 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on
2649 teachers. It is important that if honour-based violence is known or suspected, communities and family
2650 members must NOT be contacted prior to referral to the police or social care as this could increase the
2651 risk to the individual.

2652 Preventing extremism and radicalisation

2653 9.87. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism
2654 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**
2655 **Extremism and Radicalisation policy** and **0.27 E-safety policy** we all need to be vigilant in ensuring the
2656 safety from extremist and terrorist material when accessing the internet. We take into account
2657 Bournemouth, Christchurch & Poole Local Authority Safeguarding Children’s Board arrangements to fulfil
2658 its Prevent duties.

2659 9.88. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other
2660 forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’
2661 safeguarding approach.

- 2662 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the
- 2663 rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.
- 2664 This also includes calling for the death of members of the armed forces.

- 2665 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist
- 2666 ideologies associated with terrorist groups.

- 2667 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes
- 2668 serious damage to property; or seriously interferes or disrupts an electronic system. The use or
- 2669 threat **must** be designed to influence the government or to intimidate the public and is made
- 2670 for the purpose of advancing a political, religious or ideological cause.

2671 9.89. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.
2672 Background factors combined with specific influences such as family and friends may contribute to a
2673 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social
2674 media or the internet) and settings (such as within the home).

2675 9.90. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent
2676 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to
2677 changes in children’s behaviour, which could indicate that they may be in need of help or protection.

2678 Staff should use their judgement in identifying children who might be at risk of radicalisation and act
2679 proportionately which may include making a Prevent referral.

2680 9.91. The school's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent
2681 referral

2682 9.92. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act
2683 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent
2684 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2685 9.93. [An online general awareness training module on Channel is available](#). The module is suitable for school
2686 staff and other front-line workers. It provides an introduction to the topics covered by this advice,
2687 including how to identify factors that can make people vulnerable to radicalisation, and case studies
2688 illustrating the types of intervention that may be appropriate, in addition to Channel.

2689 **Prevent Duty**

2690 9.94. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs
2691 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance:
2692 for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and
2693 also covers childcare). DSLs and other senior leaders in colleges should familiar themselves with the
2694 [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out
2695 in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

2696 9.95. Local authorities will be expected to ensure appropriate frontline staff, including those of it's contractors,
2697 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism
2698 and are aware of available programmes to deal with this issue.

2699 9.96. As the independent body responsible for standards and quality improvement for further education, the
2700 Education and Training Foundation will work with the sector to ensure that appropriate training is
2701 available. This will include and draw from training provided through the network of Prevent co-
2702 ordinators.

2703 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2704 9.97. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2705 9.98. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an
2706 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity,
2707 in exchange for something the victim needs or wants, and/or for the financial advantage or increased
2708 status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can
2709 affect children, both male and female and can include children who have been moved (commonly
2710 referred to as trafficking) for the purpose of exploitation.

2711 **Child Criminal Exploitation (CCE)**

2712 9.99. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or
2713 money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be
2714 forced or manipulated into committing vehicle crime or threatening/committing serious violence to
2715 others. Children can become trapped by this type of exploitation as perpetrators can threaten victims
2716 (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying
2717 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As
2718 children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims
2719 is not always recognised by adults and professionals, (particularly older children), and they are not
2720 treated as victims despite the harm they have experienced. They may still have been criminally exploited
2721 even if the activity appears to be something they have agreed or consented to.

2722 9.100. It is important to note that the experience of girls who are criminally exploited can be very different to
2723 that of boys. The indicators may not be the same, however professionals should be aware that girls are

2724 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally
2725 exploited may be at higher risk of sexual exploitation.

2726 Child Sexual Exploitation (CSE)

2727 9.101. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by
2728 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing,
2729 and touching outside clothing. It may include noncontact activities, such as involving children in the
2730 production of sexual images, forcing children to look at sexual images or watch sexual activities,
2731 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for
2732 abuse including via the internet.

2733 9.102. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate
2734 knowledge e.g. through others sharing videos or images of them on social media.

2735 9.103. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17
2736 year olds who can legally consent to have sex. Some children may not realise they are being exploited
2737 e.g. they believe they are in a genuine romantic relationship

2738 9.104. Children with learning difficulties can be particularly vulnerable to exploitation as can children from
2739 particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual
2740 emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who
2741 go missing from home or school, children involved in crime, children with parents/carers who have
2742 mental health problems, learning difficulties/other issues, children who associate with other children
2743 involved in exploitation. However, it is important to recognise that any child can be targeted.

2744 9.105. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors
2745 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or
2746 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants
2747 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or
2748 facilitator.

2749 9.106. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of
2750 18 years, including 16 and 17 year olds who can legally consent to have sex) or adults. It is critical to know
2751 that children/young people may also be exploited by other children/young people, who themselves may
2752 be experiencing exploitation – where this is the case, it is important that the child/young person
2753 perpetrator is also recognised as a victim.

2754 9.107. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic
2755 to complex organised abuse. It can involve force and/or enticement-based methods of compliance and
2756 may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when
2757 activity appears consensual and it should be noted exploitation as well as being physical can be facilitated
2758 and/or take place online. More information include definitions and indicators are included in - [KCSIE2021](#)

2759 - Part One. Some of the following can be indicators of both child criminal and sexual exploitation where
2760 children:

- 2761 • appear with unexplained gifts or new professions;
- 2762 • associate with other young people involved in exploitation;
- 2763 • suffer from changes in emotional well-being;
- 2764 • misuse drugs and alcohol;
- 2765 • go missing for periods of time or regularly or come home late; and
- 2766 • regularly miss school or education or do not take part in education.

2767

2768 9.108. Some additional specific indicators that may be present in CSE and children who:

- 2769 • Children who have older boyfriends or girlfriends; and
- 2770 • Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected
2771 sexual development or or become pregnant.

2772 9.109. Further information on signs of a child's involvement in sexual exploitation is available in Home Office
2773 guidance: Child sexual exploitation: guide for practitioners.

2774 9.110. As an organisation we do recognise that the same level of exploitation may take place involving
2775 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18
2776 years or over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act
2777 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that
2778 the above statement will equally apply to those who are 18+ across England and Wales.

2779 9.111. Children under the age of criminal responsibility (under the age of 10), or young people who have
2780 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal
2781 activity provide opportunity for criminals to distance themselves from crime.

2782 County Lines

2783 9.112. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal
2784 drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as
2785 well as across the UK - no specified distance of travel is required. Children and vulnerable adults are
2786 exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation,
2787 violence (including sexual violence) and weapons to ensure compliance of victims. Children can be
2788 targeted and recruited. Exploitation is an integral part of the county lines, children may become victims
2789 through: coercion, intimidation, violence (including sexual) and weapons.

2790 9.113. Children can be targeted and recruited into county lines in a number of locations including schools,
2791 further and higher educational institutions, pupil referral units, special educational needs schools,
2792 children's homes and care homes. Children are often recruited to move drugs and money between
2793 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed
2794 internally to avoid detection. Children can easily become trapped by this type of exploitation as county
2795 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their
2796 families) if they attempt to leave the county lines network.

2797 9.114. Children are also increasingly being targeted and recruited online using social media. Children can easily
2798 become trapped by this type of exploitation as county lines gangs can manufacture drug debts which
2799 need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they
2800 attempt to leave the county lines network. These children and young people are at serious risk of
2801 criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not

2802 necessarily be affiliated to a gang, but who have developed networks across geographical boundaries to
2803 access and exploit existing drugs markets in these areas.

2804 9.115. The group, or individuals exploited by them, travel regularly between the urban hub and the rural
2805 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply
2806 but is generally more frequent and in smaller deal amounts compared to most other drug supply
2807 methods.

2808 9.116. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are
2809 involved in county lines. Some additional specific indicators that may be present where a child is
2810 criminally exploited through involvement in county lines are children who:

- 2811 • go missing and are subsequently found in areas away from their home;
- 2812 • have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2813 • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and
2814 collecting money for drugs;
- 2815 • are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid
2816 detection;
- 2817 • are found in accommodation that they have no connection with, often called a 'trap house or
2818 cuckooing' or hotel room where there is drug activity;
- 2819 • owe a 'debt bond' to their exploiters;
- 2820 • have their bank accounts used to facilitate drug dealing.

2821 9.117. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be
2822 considered alongside consideration of availability of local services/third sector providers who offer
2823 support to victims of county lines exploitation.

2824 **Cuckooing**

2825 9.118. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation
2826 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to
2827 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to as
2828 cuckooing.

2829 9.119. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to
2830 use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

2831 in the South of England. The crime is named for the cuckoo's practice of taking over other birds' nests for
2832 its young.

2833 9.120. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

2834 9.121. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally
2835 exploited include:

2836

- Increase in missing episodes (Education and/or Care) – particular key as children/young people can
2837 be missing for days and drug run in other counties

2838

- Having unexplained amounts of money, new high cost items and multiple mobile phones

2839

- Increased social media and phone/text use, almost always secretly

2840

- Older males in particular seen to be hanging around and driving

2841

- Having injuries that are unexplained and unwilling to be looked at

2842

- Increase in aggression, violence and fighting

2843

- Carrying weapons – knives, baseball bats, hammers, acid

2844

- Travel receipts that are unexplained

2845

- Significant missing cases from education and disengaging from previous positive peer groups

2846

- Parents/carers concerns and significant changes in behaviour that affect emotional wellbeing

2847 9.122. We will treat any child/young person who may be criminally exploited as a victim in the first instance and
2848 refer to the Local Safeguarding Authority in the first instance. If a referral to the police is also required as
2849 crimes have been committed on the school premises, these will also be made.

2850 **Knife crime**

2851 9.123. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes
2852 references to both; to the use of knives against children either to threaten or to wound them and to
2853 instances when children may have been carrying or using knives for a range of purposes.

2854 9.124. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and
2855 knife-carrying. However, there are many different criminal offences relating to knives. For example:

2856

- it is an offence to threaten or cause harm to a person with a bladed weapon

2857

- some bladed weapons are prohibited from being sold or purchased, including to anyone
2858 under the age of 18

2859

- offences such as robbery or assault can be aggravated if a knife is involved

2860

- it is also an offence to carry a knife in a public place without good reason.

2861

- It is clear that knife crime is an increasing safeguarding risk to children and young people,
2862 both at school and in their local communities. While Ofsted have not sought to answer the
2863 question of the causes of knife crime, leaders told Ofsted that, in their experience, children
2864 are in three categories of risk of knife-carrying.

2865 9.125. The highest level of risk is for those children who have been groomed into gangs, for the purposes of
2866 criminal exploitation.

2867 9.126. Underneath this lies a group of children who have witnessed other children carrying knives, have been
2868 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or

2869 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on
2870 social media.

2871 9.127. Then there are children who carry knives to school as an isolated incident. For example, they may carry
2872 a penknife that a grandparent has gifted them

2873 9.128. It is important to remember that knife crime does not exist in a vacuum and children who are victims or
2874 perpetrators may also be experiencing multiple vulnerabilities.

2875 9.129. Some children and young people can be more at risk of being drawn into criminality, multiple studies
2876 demonstrate a clear link between inequality and high rates of violence for example. There is a need to
2877 both understand and address individual risk factors as well as address the social challenges that underpin
2878 criminal exploitation and serious violence in our communities, from poor mental health, addiction,
2879 poverty, unemployment and poor-quality housing.

2880 **Missing young people and the link between missing and county lines**

2881 9.130. Every precaution is taken through the use of risk assessments and thorough planning and supervision to
2882 ensure that children, young people and young adults are safe both at school, college, home, and on
2883 outings. If a child, young person or young adult goes missing from our Location it is considered a potential
2884 indicator of abuse or neglect.

2885 9.131. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of
2886 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to attend
2887 school regularly or has been absent without the school's permission for a continuous period of 10 days
2888 or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs
2889 such as travelling to conflict zones, FGM and forced marriage.

2890 9.132. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them
2891 towards going missing and becoming involved in criminal activities. Some individuals may be pulled
2892 towards exploitation through the promise of money, gifts, affection and status. However, they may be
2893 then be forced to work for these people as they are coerced into believing that they are indebted to
2894 them.

2895 **Domestic abuse**

2896 9.133. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever
2897 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as
2898 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of
2899 domestic abuse, based on the previous cross-government definition, ensures that different types of
2900 relationships are captured, including ex-partners and family members. The definition captures a range of
2901 different abusive behaviours, including physical, emotional and economic abuse and coercive and
2902 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the
2903 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as
2904 defined in section 2 of the 2021 Act).

2905 9.134. Types of domestic abuse include intimate partner violence, abuse by family members, teenage
2906 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of
2907 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and
2908 domestic abuse can take place inside or outside of the home. The government will issue statutory
2909 guidance to provide further information for those working with domestic abuse victims and perpetrators,
2910 including the impact on children.

2911 9.135. All children can witness and be adversely affected by domestic abuse in the context of their home life
2912 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence
2913 can have a serious, long lasting emotional and psychological impact on children. In some cases, a child
2914 may blame themselves for the abuse or may have had to leave the family home as a result.

2915 9.136. Young people can also experience domestic abuse within their own intimate relationships. This form of
2916 peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of
2917 the young people, this may not be recognised in law under the statutory definition of 'domestic abuse'

2918 (if one or both parties are under 16). However, as with any child under 18, where there are concerns
2919 about safety or welfare, child safeguarding procedures should be followed and both young victims and
2920 young perpetrators should be offered support. The Act's provisions, including the new definition, will be
2921 commenced over the coming months.

2922 9.137. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work
2923 together to provide emotional and practical help to children. The system ensures that when police are
2924 called to an incident of domestic abuse, where there are children in the household who have experienced
2925 the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or
2926 children arrive at school the following day. This ensures that the school has up to date relevant
2927 information about the child's circumstances and can enable immediate support to be put in place,
2928 according to the child's needs. Operation Encompass does not replace statutory safeguarding
2929 procedures. Where appropriate, the police and/or schools should make a referral to children's social care
2930 if they are concerned about a child's welfare. More information about the scheme and how schools can
2931 become involved is available on the Operation Encompass website.

2932 9.138. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence,
2933 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well
2934 as those who are worried about friends and loved ones. It also has a form through which a safe time from
2935 the team for a call can be booked. Additional advice on identifying children who are affected by domestic
2936 abuse and how they can be helped is available at:

- 2937 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 2938 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 2939 • [Saflives: young people and domestic abuse](#).
- 2940 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes
2941 information for adult victims, young people facing abuse in their own relationships and
2942 parents experiencing child to parent violence/abuse)
- 2943 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic
2944 abuse on children)

2945 Serious Violent Crime

2946 9.139. All staff should be aware of indicators, which may signal that children are at risk from, or are involved
2947 with serious violent crime. These may include:

- 2948 • increased absence from school with a significant decline in performance,
- 2949 • a change in friendships or relationships with older individuals or group,
- 2950 • signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries,
- 2951 • unexplained gifts or new possessions could also indicate that children have been approached by, or
2952 are involved with individuals associated with criminal networks or gangs.

2953 9.140. All staff should be aware of the associated risks and understand the measures in place to measure these.
2954 Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang

2955 involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance -](#)
2956 [September 2018](#).

2957 Mental Health

2958 9.141. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing
2959 of young people. All staff should be aware that mental health problems can, in some cases, be an indicator
2960 that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

2961 9.142. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying
2962 possible mental health problems, including routes to escalate and clear referral and accountability
2963 systems.

2964 9.143. The Department is providing funding to support costs of a significant training program for senior mental
2965 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be
2966 available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school
2967 or college approach to mental health.

2968 9.144. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.
2969 Staff however, are well placed to observe children day-to-day and identify those whose behaviour
2970 suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff
2971 suspect this might be the case they should report their concerns to a senior leader within the school and
2972 if possible bring their concerns to a member of the clinical team.

2973 9.145. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood
2974 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is
2975 key that staff receive appropriate education and training so that they are aware of how these children's
2976 experiences, can impact on their mental health, behaviour and education.

2977 9.146. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action
2978 should be taken. Staff should follow their child protection policy and speak immediately to the DSL or a
2979 deputy.

2980 9.147. Schools and colleges can access a range of advice to help them identify children in need of extra mental
2981 health support, this includes working with external agencies. More information can be found in the
2982 [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best
2983 practice. Public Health England has produced a range of resources to support secondary school teachers
2984 to promote positive health, wellbeing and resilience among children.

2985 9.148. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful
2986 for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools
2987 and colleges can help prevent mental health problems by promoting resilience as part of an integrated,
2988 whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their
2989 pupils.

2990 9.149. In addition, Public Health England has produced a range of resources to support secondary schools to
2991 promote positive health, wellbeing and resilience among children including its guidance Promoting
2992 children and young people's emotional health and wellbeing. Its resources include social media, forming
2993 positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The
2994 Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff
2995 with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our

2996 [Wellbeing for education recovery program](#) content, which covers issues such as bereavement, loss,
2997 anxiety, stress and trauma.

2998 **Human trafficking**

2999 9.150. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process
3000 that is a combination of:

- 3001 - Movement (including within the UK);
- 3002 - Control, through harm / threat of harm or fraud
- 3003 - For the purpose of exploitation

3004 9.151. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming
3005 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a
3006 life of abuse, servitude and inhumane treatment.

3007 9.152. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is
3008 significant evidence that children/young people/young adults (both of UK and other citizenship) are being
3009 trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

3010 9.153. There are a number of indicators which suggest that a child/young person/young adult may have been
3011 trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as
3012 follows:

- 3013 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has
3014 an unwanted pregnancy
- 3015 - Has a history with missing links and unexplained moves
- 3016 - Is required to earn a minimum amount of money every day
- 3017 - Works in various locations
- 3018 - Has limited freedom of movement
- 3019 - Appears to be missing for periods
- 3020 - Is known to beg for money
- 3021 - Is being cared for by adult/s who are not their parents and the quality of the relationship between
3022 the child and their adult carers is not good
- 3023 - Is one among a number of unrelated children found at one address
- 3024 - Has not been registered with or attended a GP practice
- 3025 - Is excessively afraid of being deported.

3026 9.154. For those children/young people/young adults who are internally trafficked within the UK indicators
3027 include:

- 3028 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3029 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3030 - Reports from reliable sources suggesting the likelihood of involvement in
- 3031 - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- 3032 - Evidence of drug, alcohol or substance misuse

- 3033 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing
3034 from older people
- 3035 - Relationship with a significantly older partner
- 3036 - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible
3037 explanation of the source of necessary funding
- 3038 - Persistently missing, staying out overnight or returning late with no plausible explanation
- 3039 - Returning after having been missing, looking well cared for despite having not been at home
- 3040 - Having keys to premises other than those known about
- 3041 - Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating
3042 disorder, promiscuity
- 3043 - Truancy / disengagement with education
- 3044 - Entering or leaving vehicles driven by unknown adults
- 3045 - Going missing and being found in areas where the child/young person/young adult has no known
3046 links; and/or
- 3047 - Possible inappropriate use of the internet and forming on-line relationships, particularly with
3048 adults/other adults.

3049 9.155. These behaviours themselves do not indicate that an Individual is being trafficked, but should be
3050 considered as indicators that this may be the case.

3051 **Modern slavery and the National Referral Mechanism**

3052 9.156. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.
3053 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced
3054 criminality and the removal of organs.

3055 9.157. When considering modern slavery, there is a perception that this is taking place overseas. The
3056 government estimates that tens of thousands of slaves are in the UK today.

3057 9.158. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,
3058 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from
3059 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been
3060 rescued within the UK.

3061 9.159. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be
3062 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

3063 9.160. Further information on the signs that someone may be a victim of modern slavery, the support available
3064 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.
3065 Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

3066 **Cybercrime**

3067 9.161. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised
3068 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line)

3069 or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes
3070 include:

- 3071 • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer
3072 network to look for test paper answers or change grades awarded;
- 3073 • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,
3074 network or website unavailable by overwhelming it with internet traffic from multiple sources;
3075 and
- 3076 • making, supplying or obtaining malware (malicious software) such as viruses, spyware,
3077 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,
3078 including those above.

3079 9.162. Children with particular skill and interest in computing and technology may inadvertently or
3080 deliberately stray into cyber-dependent crime.

3081 9.163. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the
3082 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and
3083 led by the National Crime Agency, working with regional and local policing. It aims to intervene where
3084 young people are at risk of committing, or being drawn into, low level cyber-dependent offences and
3085 divert them to a more positive use of their skills and interests.

3086 9.164. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of
3087 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line
3088 bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to](#)
3089 [call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

3090 **Initiation/Hazing**

3091 9.165. Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a
3092 private school, sports team etc. There are a number of different forms, from relatively mild rituals to
3093 severe and sometimes violent ceremonies in gangs/criminal groups.

3094 9.166. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which
3095 promote a bond between them. After the hazing is over, the newcomers also have something in common
3096 with older members of the organisation, because they all experienced it as part of a rite of passage. Many
3097 rituals involve humiliation, embarrassment, abuse, and harassment.

3098 9.167. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour
3099 and raise awareness of such within all services.
3100

3101 **Safeguarding issues relating to Individual children and young people needs**

3102 **Homelessness**

3103 9.168. As an organisation we recognise that being homeless or being at risk of becoming homeless presents a
3104 real risk to a child's/young person welfare. The impact of losing a place of safety and security can affect
3105 an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress
3106 concerns at the earliest opportunity.

3107 9.169. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing
3108 Authority for the parent/guardians in order to raise/progress concerns.

3109 9.170. In most cases school and college colleagues will be considering homelessness in the context of children
3110 who live with their families, and intervention will be on that basis. However, it should also be recognised
3111 in some cases 16 and 17 year olds could be living independently from their parents or guardians, for
3112 example through their exclusion from the family home, or other reasons. This will require a different level
3113 of intervention and support. Children's services will be the lead agency for these young people and the
3114 DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The

3115 department and the Ministry of Housing, Communities and Local Government have published joint
3116 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless
3117 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3118 9.171. Guidance on how local authorities should exercise their homelessness functions in accordance with the
3119 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local](#)
3120 [authorities](#).

3121 9.172. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young
3122 people and the DSL should ensure appropriate referrals are made based on the Individual's
3123 circumstances.

3124 9.173. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be
3125 progressed as appropriate, this does not, and should not, replace a referral into the Local Safeguarding
3126 Authority where an Individual has been harmed or is at risk of harm.

3127 **Private Fostering**

3128 9.174. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be
3129 cared for by another adult who is not closely related and is not a legal guardian with parental
3130 responsibility for 28 days or more.

3131 9.175. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,
3132 uncle or aunt.

3133 9.176. The Law requires that the carers and parents must notify the Children's Services Department of any
3134 private fostering arrangement.

3135 9.177. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is
3136 being privately fostered they will inform the Children's Services Department and inform both the parents
3137 and carers that they have done so.

3138 **Child and the Court System**

3139 9.178. As an organisation we recognise that children/young people are sometimes required to give evidence in
3140 criminal courts, either for crimes committed against them or for crimes they have witnessed. We know
3141 that this can be a stressful experience and therefore services across the organisation will aim to support
3142 children through this process.

3143 9.179. Along with information, advice and guidance, services will use age-appropriate materials published by
3144 HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means
3145 to be a witness, how to give evidence and the special measures which are in place to assist such as using
3146 a live link/aids to communicate and video links.

3147 9.180. We recognise that making child arrangements via the family courts following separation can be stressful
3148 and entrench conflict in families. This can be very stressful for children. Services will support
3149 children/young people going through this process.

3150 9.181. Alongside information, advice and guidance services will use online materials published by The Ministry
3151 of Justice (2018) which offers children/young people information & advice on the dispute resolution

3152 service - [Get help with child arrangements](#). These materials will also be offered to parents and carers if
3153 appropriate.

3154 9.182. Ensure that children/young people are sufficiently supported where a parent has been sent to prison,
3155 adequate support includes protection from: stigma, isolation and poor mental health.

3156 **Fabricated or induced illnesses (FII)**

3157 9.183. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually
3158 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3159 9.184. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's
3160 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3161 9.185. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This
3162 ranges from extreme neglect (failing to seek medical care) to induced illness.

3163 9.186. Behaviours in FII include a parent/carer who:

- 3164 - persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3165 - exaggerates or lies about their child's symptoms,
- 3166 - manipulates test results to suggest the presence of illness – for example, by putting glucose in urine
3167 samples to suggest the child has diabetes,
- 3168 - deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
3169 medication or other substances.

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