

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

## Beverley School

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Policy Author	Policy and Performance Team – children’s services
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### Contents

<b>1. Monitoring and review</b>	<b>2</b>
<b>2. Terminology</b>	<b>4</b>
<b>3. Definitions and age related arrangements</b>	<b>4</b>
Multi agency working – Safeguarding Partners & Children’s Social Care	6
Child protection definition	6
Safeguarding definition – Working together to safeguarding children 2018	6
Safeguarding definition – Keeping Children Safe in Education 2021	7
Safeguarding Adults	7
The difference between safeguarding and child protection	7
Abuse and neglect – child and young person context	7
<b>4. Purpose</b>	<b>8</b>
<b>5. Policy</b>	<b>9</b>
Safeguarding culture of the organisation	9
Divisional Safeguarding Board	10
What staff should read and be aware of	10
Whole service approach to Safeguarding	12
Children with special educational needs and disabilities or physical health issues	13
<b>6. Procedure</b>	<b>13</b>
Roles and responsibilities	13
Information sharing and managing the child protection file	16
LADO referral criteria (KCSIE2021) – meeting the harm threshold	17
Children potentially at greater risk of harm	17
Unexplained body marks	18
A disclosure from an Individual	18
Risk Assessment	20
Following a report - what to consider	20
Options to manage the report	21
Unsubstantiated, unfounded, false or malicious reports	22
Safeguarding and supporting the victim	22
Safeguarding and supporting the alleged perpetrator(s)	22
Setting priorities	23
Allegation of abuse by one or more Individuals on another Individual	24
Allegation of abuse of an Individual who is not registered at our provision – staff involved	24
Allegation of abuse of an Individual who is not registered at our provision- third party involved	24
Allegations against staff	25

43	Allegations against staff in Education .....	25
44	Allegations against supply teachers and all workers supplied by agency .....	26
45	Allegations against the DSL (Principal or Registered Manager or DSL as a substantive role) .....	26
46	Allegations against the Managing Director .....	27
47	Allegations against any other Senior Leader .....	27
48	Allegations against the Chief Operating Officer / Head of Children's Services .....	28
49	Allegations against the Chief Executive Officer .....	28
50	Low level concerns .....	28
51	The initial response to allegation .....	29
52	No Further Action .....	30
53	Further enquiries .....	30
54	Suspension .....	31
55	Supporting those involved .....	31
56	Allegation outcomes .....	31
57	Serious incident reporting .....	32
58	Death of someone in our care including rapid response to unexpected death .....	32
59	Abuse of position of trust .....	32
60	Volunteers .....	33
61	Contractors .....	33
62	Use of school or college premises for non-school/college activities .....	33
63	Extended school and off-site arrangements .....	33
64	Use of mobile phones .....	33
65	Photography and images .....	34
66	Physical intervention and use of reasonable force .....	34
67	Staff Taking Medication or other substances .....	34
68	Information for individuals and relatives/carers .....	34
69	Recruitment and vetting .....	34
70	Requirements to inform Disclosure and Barring Services (DBS) .....	35
71	Record-keeping .....	35
72	Monitoring .....	36
73	Training .....	36
74	Confidentiality and information sharing .....	36
75	Complaints and Monitoring .....	38
76	<b>7. Accountability .....</b>	<b>38</b>
77	<b>8. Further Safeguarding information – what everyone need to know (Appendix 11) .....</b>	<b>39</b>
78	<b>9. Appendices .....</b>	<b>40</b>
79	Appendix 1: Relevant policies and documents .....	40
80	Appendix 2: Legislation and guidance .....	42
81	Appendix 3: Child Protection and safeguarding procedure (Flow chart) .....	43
82	Appendix 4: Types of abuse – children .....	44
83	Appendix 5: Types of abuse - adults .....	45
84	Appendix 6: Signs that someone could be a victim .....	47
85	Appendix 7: Signs that someone could be an abuser .....	49
86	Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions,	
87	reporting and recording procedure .....	50
88	Appendix 9: Key contacts .....	53
89	Appendix 10. Safeguarding in children's Services - illustration .....	55
90	Appendix 11. Further Safeguarding information – what everyone needs to know .....	55

## 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



Ann Marie Edwards  
**Headteacher**  
Sept 2021

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## 2. Terminology

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

<b>‘Establishment’ or ‘Location’</b>	This is a generic term which means the Children’s Home/school/college.
<b>Individual</b>	This means any child or young person under the age of 18, young adult between the ages of 18 and 25. At Beverley we have pupils/students attending our school between the ages of 9-18
<b>Head of Service</b>	This is the senior person with overall responsibility for the school. At Beverley this is Headteacher Ann Marie Edwards.
<b>Key Worker</b>	Members of staff that have special responsibility for Individuals attending the Establishment.
<b>Parent, Carer, Guardian</b>	Means parent or person with Parental Responsibility
<b>Regulatory Authority</b>	Regulatory Authority is the generic term used in this policy to describe the independent regulatory body responsible for inspecting and regulating services.
<b>Social Worker</b>	This means the worker allocated to the individual’s family. If there is no allocated worker, the Duty Social Worker or Team Manager is responsible.
<b>Safeguarding Authority</b>	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
<b>LADO</b>	Local Authority Designated Officer
<b>DSL/DSL Deputy</b>	Designated Safeguarding Lead/Designated Safeguarding Lead Deputy
<b>Placing Authority</b>	Placing Authority means the local authority/agency responsible for placing the child or commissioning the service
<b>Staff</b>	Means full or part-time employees of Cambian, agency workers, bank workers, contract workers and volunteers.
<b>CambianKPI</b>	The online in-house information system which holds data for each site on quality measures.

## 3. Definitions and age-related arrangements

- 3.1. **Children and Young people are under 18.** Whilst Working together to Safeguard Children (2018) applies to children and young people until they reach the age of 18, Keeping Children Safe in Education (2021)

155 now applies to providers of post 16 education as set out in Education and Training (Welfare of Children)  
156 Act 2021.

157 3.2. **Adults are over the age of 18.** Over 18 year olds are covered by the Local Safeguarding Adult Boards  
158 (LSABs). Government guidance can be gained from the Care Act 2014. An adult at risk of harm or abuse  
159 is any person who has needs for care and support and, is experiencing or at risk of abuse or neglect; and  
160 as a result of their particular care and support needs, is unable to protect themselves from either the risk

161 of, or the experience of abuse or neglect'. We refer to adult service users in our provision as **young adults**  
162 due to the fact we provide children's services up to the age of 25.

163 3.3. The Social Services and Well-being (Wales) Act 2014 came into force in April 2016 and it provides the  
164 legal framework for social service provision in Wales. It sets out what must and should be done to

165 3.4. Safeguard children and adults. At a local level regional safeguarding children's boards co-ordinate and  
166 ensure the effectiveness of work to protect and promote the welfare of children.

167 3.5. Staff working with young adults aged 18 and over, who receive education, care and support from our  
168 children's services division will follow the Adult safeguarding referral process to LSAB/MASH/Regional  
169 Safeguarding Children's Boards depending on local arrangements.

170 3.6. This policy addresses children and young people up to the age of 18 and those over the age of 18 who  
171 attend a day or residential school or college – this might be 38 or 52 weeks' provision. Some children

172 3.7. Attending school or college live in children's homes or care homes across England and Wales, hence the  
173 reason why this policy and procedure is more comprehensive than that of a traditional day school

174 or college. Our safeguarding responsibility extends beyond day education and often covers 24hrs services  
175 regulated by various regulators across the UK.

176 3.8. Where we make references to schools and colleges, this also includes associated children's or care homes  
177 in which children/young people live. Where we make references to children's or care homes, those cover  
178 all children's/care homes including those within the children's residential care division.  
179

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

181 Children Social Care - provide support to children in need of help and protection, including children with  
182 disabilities. Services include statutory assessment and care planning for children at risk of

183 significant harm, provision for cared for children and care experienced young people, as well as fostering  
184 and adoption services.

185 3.9. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing  
186 bodies and proprietors should ensure that the school or college contributes to multi-agency working in  
187 line with statutory guidance [Working Together to Safeguard Children](#).

188 3.10. Locally, the three safeguarding partners (the local authority, a clinical commissioning group for an area  
189 within the local authority and the chief officer of police for an area (any part of which falls) within the  
190 local authority area made arrangements to work together with appropriate relevant agencies to

191 3.11. Safeguard and promote the welfare of local children, including identifying and responding to their needs.

192 3.12. It is especially important that schools and colleges understand their role in the three safeguarding partner  
193 arrangements. Governing bodies, proprietors and their senior leadership teams, especially their DSLs,  
194 should make themselves aware of and follow their local arrangements.

195 3.13. The three safeguarding partners should make arrangements to allow all schools and colleges in the local  
196 area to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally,  
197 the three safeguarding partners will name schools and colleges as relevant agencies and

198 will reach their own conclusions on the best way to achieve the active engagement with individual  
199 institutions in a meaningful way.

## 200 **Child protection definition**

201 3.14. Child protection is part of the safeguarding process. It focuses on protecting individual children identified  
202 as suffering or likely to suffer significant harm. This includes child protection procedures which detail how  
203 to respond to concerns about a child.

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

- 205 3.15. **Safeguarding children and young people** is the action that is taken to promote the welfare of children  
206 and protect them from harm. It means:
- 207 • Protecting children from abuse and maltreatment,
  - 208 • Preventing harm to children's health or development,
  - 209 • Ensuring children grow up with the provision of safe and effective care,
  - 210 • Taking action to enable all children and young people to have the best outcomes.

## 211 **Safeguarding definition – Keeping Children Safe in Education 2021**

- 212 3.16. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes  
213 into contact with children and their families has a role to play. In order to fulfil this responsibility  
214 effectively, all practitioners should make sure their approach is child-centred. This means that they should  
215 consider, at all times, what is in the best interests of the child.

- 216 3.17. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 217 • Protecting children from maltreatment,
- 218 • Preventing impairment of children's mental and physical health or development,
- 219 • Ensuring that children grow up in circumstances consistent with the provision of safe and effective  
220 care, and
- 221 • Taking action to enable all children to have the best outcomes.

## 222 **Safeguarding Adults**

- 223 3.18. Safeguarding Adults means protecting an adult's right to live in safety, free from abuse and neglect.  
224 It is about people and organisations working together to prevent and stop both the risks and experience of abuse  
225 or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where  
226 appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action.

- 227 3.19. The statutory guidance enshrines the **six principles** of adults safeguarding:

- 228
- 229 • Empowerment - presumption of person led decisions and informed consent
- 230 • Prevention - it is better to take action before harm occurs
- 231 • Proportionality - proportionate and least intrusive response appropriate to the risk presented
- 232 • Protection - support and representation for those in greatest need
- 233 • Partnerships - local solutions through services working with their communities
- 234 • Accountability - accountability and transparency in delivering safeguarding

- 235 3.20. Caretech has Safeguarding Adults at Risk (England) and Safeguarding Adults (Wales) policies and  
236 procedures which apply to its Adults' Services. Both policies can be accessed via Rezume. Services  
237 operating in Wales can find their Safeguarding Regional Boards via this hyperlink which provides access  
238 to local procedures for each Board <https://safeguardingboard.wales/find-your-board/>.

## 239 **The difference between safeguarding and child protection**

- 240 3.21. In relation to children's services - in practice safeguarding is the policies and practices that  
241 schools/colleges/children's homes employ to keep children safe and promote their well-being. This  
242 means everything from security of the buildings, to the safe recruitment of staff and everything in  
243 between. **Appendix 10.** Illustrates Safeguarding in children's services.

## 244 **Abuse and neglect – child and young person context**

- 245 3.22. In the context of a child/young person abuse and neglect are forms of maltreatment. Somebody may  
246 abuse or neglect a child/young person by inflicting harm, or by failing to act to prevent harm.  
247 Children/young people may be abused in a family or in an institutional or community setting, by those

known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child/young person or children/young people.

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

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

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

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

## 4. Purpose

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

4.2. This policy is aligned with legislation outlined in **Appendix 2 – Legislation and guidance**, and it complies with the statutory and best practice guidance as set out in the **25.10 Staff Safeguarding Information Poster**. This policy complies with East Riding locally agreed procedures. Printed or electronic copies of



the Local Safeguarding Children's Partnerships (LSCP), Local Safeguarding Adults Board (LSAB) or Regional Safeguarding Children's Boards (Wales) procedures are available in every setting.

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

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

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

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

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

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

## 5. Policy

### Safeguarding culture of the organisation

5.1. Cambian safeguarding culture can be best described as:

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

295 strong governance and leadership, raising awareness through and enhancing children's and young  
296 people's capacity around the risks and their own safety, regular reflective supervision).

297 - **Reactive** (taking swift actions, reducing the risk of harm to a minimum, involving other professionals  
298 in timely manner, active listening, applying theory in practice in a methodical way).

299 - **Reflective** (understanding 'how we got there in the first place', completing a reflective account of  
300 events, involving other key professionals in future planning, identifying actions and further changes  
301 to be made.

302 5.2. Child Protection and Safeguarding is everyone's responsibility. Everyone working for or visiting our  
303 locations has a responsibility to understand and implement this policy and procedure at all times.

304 5.3. All Individuals in our services have a right to feel safe, secure and be protected from harm.

305 5.4. As a provider of specialist education and care services it is imperative that all staff are aware that all  
306 Individuals with Special Educational Needs (SEN) and disabilities:

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

313 5.5. The most common reason for children or young people being looked after is as a result of abuse/neglect.  
314 We will ensure all staff have the skills, knowledge and understanding to help keep children and young  
315 people safe.

316 5.6. All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or  
317 disclosure that may indicate an Individual is at risk of harm, either in the school, college, and care home  
318 or in the community, taking into account contextual safeguarding, see **Appendix 11 - Further**  
319 **safeguarding information – what everyone need to know** which also contains information related to  
320 safeguarding issues related to individual children and young people's needs.

321 5.7. We have a duty to help Individuals learn how to keep themselves safe and deepen their understanding  
322 of safeguarding, through both formal curriculum and informal opportunities.

323 5.8. As an organisation we acknowledge that working in partnership with other agencies protects Individuals  
324 and reduces risk and so we will engage in partnership, working throughout the child protection process  
325 to safeguard children and will equally work through safeguarding adults' procedures as directed by local  
326 procedures.

327 5.9. A comprehensive list of all supporting documentation and related policies, procedures and guidance  
328 referred to in this document can be found in separate appendices at the end of this document.

### 329 **Divisional Safeguarding Board**

330 5.10. As an organisation Caretech children's services operates 3 Divisional Safeguarding Boards: Education,  
331 Residential Care and Fostering. The main purpose of each board is to ensure that all services across  
332 all divisions discharge their responsibilities effectively for assuring safe and secure services for  
333 children and young people, and manage all safeguarding risks appropriately within its own workforce,  
334 including direct employees and also the contracted workforce (supply workers/agency/contractor and  
335 subcontractors). The full terms of reference for each Board is available on [Cambian Point](#).

### 336 **What staff should read and be aware of**

337 5.11. KCSIE2021 guidance replaces Keeping Children Safe in Education 2020 updated in January 2021. The  
338 changes will come into force from September 2021. The statutory guidance should be read and followed

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

341 5.12. All staff in Caretech/Cambian schools and colleges must read at least [Part one of KCSiE2021](#) guidance  
342 and school/colleges should have a record to confirm this has been completed prior to 1<sup>st</sup> September 2021.

343 5.13. HTs / Principals and DSL (or a deputy) should read the [whole KCSiE2021 Guidance](#).

344 5.14. The guidance also suggests that Governors and Proprietor should read [Annex A](#) which is a condensed  
345 version of Part one: 'Annex A can be provided (instead of Part one) to those staff who do not directly  
346 work with children, if the governing body or proprietor think it will provide a better basis for those staff  
347 to promote the welfare and safeguard children'. The Organisation maintains that all staff including those  
348 supporting the school/college with frequent or less frequent visits to the site read at **least Part One** so all  
349 staff understand their safeguarding responsibilities.

350 5.16 The guidance should be read alongside:

- 351 • Statutory guidance - [Working Together to Safeguard Children](#)
- 352 • Departmental advice - [What to do if you are Worried a Child is Being Abused - Advice for Practitioners](#)  
353 ; and;
- 354 • [Part 5 of KCSiE2021](#) should be read alongside the departmental advice - [Sexual violence and sexual](#)  
355 [harassment between children in schools and colleges](#) which contains further details on: what sexual  
356 violence and sexual harassment constitutes, important context to be aware of, including; what is  
357 consent, power imbalances, and developmental stages, harmful sexual behaviour (HSB), including  
358 that a child displaying HSB may be an indication that they are a victim of abuse themselves, related  
359 legal responsibilities for schools and colleges, advice on a whole school or college approach to  
360 preventing child on child sexual violence and sexual harassment, and more detailed advice on  
361 responding to reports of sexual violence and sexual harassment, including safeguarding and  
362 supporting both the victim(s) and alleged perpetrator(s).

363 5.15. In July 2021 DSL (or a deputy) within Education division, Heads/Principals, Representative from Children's  
364 residential care (Senior Managers), Representatives from Business Support Functions and Directors  
365 attended KCSiE2021 webinar provided by the Safeguarding Network. Following the webinar, recording of  
366 session and the additional learning resources have been shared with the participants to support  
367 dissemination to their teams.

368 5.16. Caretech/Cambian schools and colleges are members of the Safeguarding Network and should plan how  
369 the learning will take place with their staff, organise KCSiE2021 knowledge check (via Safeguarding  
370 Network) and ensure that the record of completed knowledge check is stored on MYRUS - the  
371 Organisation's Learning and Development platform .

372 5.17. The Heads/Principals and DSL should ensure that mechanisms are in place to assist staff to understand  
373 and discharge their role and responsibilities as set out in Part one of KCSiE2021 guidance. Schools and

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

376 5.18. All staff should be aware of systems within their school or college which support safeguarding and these  
377 should be explained to them as part of staff induction. This should include the:

- 378 - Child protection and safeguarding policy
- 379 - Behaviour Support policy
- 380 - Anti bullying policy
- 381 - Whistleblowing policy, Code of conduct and Code of Practice policy
- 382 - Missing from Care policy, local procedure for children missing from education
- 383 - Role of the DSL (including the identity of the DSL and any deputies)
- 384 - Have Access to policies and a copy of Part one of KCSIE2021
- 385 - All staff should be aware of their local early help process and understand their role in it, more  
386 information can be found in [Working Together to Safeguard Children 2018](#)  
387 ([publishing.service.gov.uk](#)).

388 5.19. All staff should be aware of the process for making referrals to children's social care and for statutory  
389 assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child  
390 suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might  
391 be expected to play in such assessments.

392 5.20. Schools concerned about a child's welfare should refer their concern to local authority children's social  
393 care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's  
394 social care (and if appropriate the police) is made immediately. Referrals should follow the local referral  
395 process. Children's homes/care homes should follow their referral process as per their local procedure  
396 and contact Safeguarding Partner/Safeguarding Board as per their local Safeguarding procedure.

397 5.21. All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff  
398 should know how to manage the requirement to maintain an appropriate level of confidentiality. This  
399 means only involving those who need to be involved, such as the DSL (or a deputy) and children's social  
400 care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse,  
401 as this may ultimately not be in the best interests of the child.

402 5.22. Staff should **not** assume a colleague, or another professional will take action and share information that  
403 might be critical in keeping children safe. They should be mindful that early information sharing is vital  
404 for the effective identification, assessment, and allocation of appropriate service provision, whether this  
405 is when problems first emerge, or where a child is already known to local authority children's social care  
406 (such as a child in need or a child with a protection plan).

#### 407 **Whole service approach to Safeguarding**

408 5.23. The proprietor and service (school/college/home) leaders should ensure they facilitate a whole school or  
409 college approach to safeguarding. This means ensuring safeguarding and child protection are at the  
410 forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems,  
411 processes and policies should operate with the best interests of the child at their heart.

412 5.24. Where there is a safeguarding concern, the proprietor and service leaders should ensure the child's  
413 wishes and feelings are taken into account when determining what action to take and what services to  
414 provide. Systems should be in place, and they should be well promoted, easily understood and easily

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

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

418 5.25. Children with special educational needs or disabilities (SEND) or certain health conditions can face  
419 additional safeguarding challenges. There might be some additional barriers when recognising abuse and  
420 neglect in this group of children. These can include:

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

429 5.26. SEN division and other services where children have/may have SEND should consider extra pastoral  
430 support and attention for these children, along with ensuring any appropriate support for communication  
431 is in place. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and](#)  
432 [Supporting Pupils at School with Medical Conditions](#).

## 433 **6. Procedure**

### 434 **Roles and responsibilities**

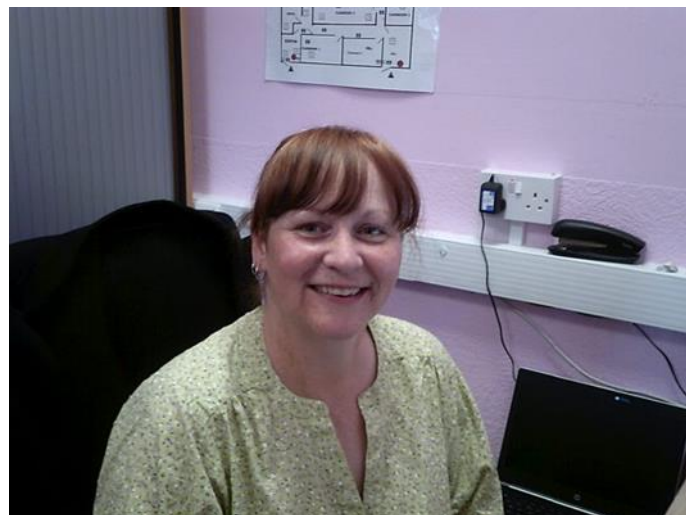
435 6.1. **All employees, volunteers, consultants, agency staff, sub-contractors, partner organisations and**  
436 **visitors** are obliged to follow this policy and maintain an environment that prevents exploitation and  
437 abuse and which encourages reporting of breaches of this policy using the appropriate procedures.

438 6.2. **Managers at all levels** are responsible for ensuring volunteers, consultants, agency staff, sub-contractors,  
439 partner organisations and visitors are aware of the policy and are supported to implement and work in  
440 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.

**Beverley School DSL**



Name: Ann Marie Edwards

Contact: 07825319128

- 6.4. **Our DSL** is Ann Marie Edwards 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

- 460 and welfare (including online and digital safety) and when deciding whether to make a referral by  
461 liaising with relevant agencies so that children's needs are considered holistically.
- 462 • Liaise with the senior mental health lead and, where available, the Mental Health Support Team,  
463 where safeguarding concerns are linked to mental health.
  - 464 • Refer all cases of suspected abuse or allegations of abuse to the East Riding safeguarding board (child  
465 or adult) and where appropriate - Local Authority Designated Officer (LADO).
  - 466 • Liaise with the head teacher or principal (if they are not the DSL themselves) to inform him or her of  
467 issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police  
468 investigations.
  - 469 • As required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for  
470 child protection concerns in cases which concern a staff member.
  - 471 • Refer cases to the Channel programme where there is a radicalisation concern as required.
  - 472 • Refer cases where a person is dismissed or left due to risk/harm to a child/young person to the  
473 Disclosure and Barring Service as required; and
  - 474 • Refer cases where a crime may have been committed to the Police as required.
  - 475 • Act as a source of advice, support and expertise within the location when deciding to make a referral  
476 by liaising with relevant agencies.
  - 477 • Help promote educational outcomes by sharing the information about the welfare, safeguarding and  
478 child protection issues that children are experiencing, or have experienced, with teachers and school  
479 and college leadership staff.
  - 480 • Identify staff safeguarding training needs and organise training for their staff.
  - 481 • Participate in local safeguarding boards when required.
  - 482 • Evaluate and contribute to high standards of safeguarding practice at the location.
  - 483 • Work to ensure that the wellbeing of children and young people is in constant focus and that they are  
484 guarded from harm or abuse.
  - 485 • Ensure the child protection and safeguarding policy is available publicly and parents/those with  
486 parental responsibility are aware of the fact that referrals about suspected abuse or neglect may be  
487 made and the role of the school/college/home in this.
  - 488 • Understands the relevant data protection legislation and regulations, especially The Data Protection  
489 Act 2018.
- 490 6.5. More details about the role of the DSL including their availability, management of referrals, information  
491 sharing, working with others, raising awareness and other can be found in [KCSIE 2021 Annex C – Role of](#)  
492 [the DSL](#).
- 493 6.6. **Designated Deputy** – will act up in the absence of the DSL and compliment their ongoing work where  
494 asked do to so. There are arrangements for covering the role of the DSL when Annmarie Edwards is



unavailable. Our larger provisions such as schools and college will have an internal Safeguarding Team lead by a DSL with a number of deputies where required. Our Designated Deputy is Adele Bell.



Name: Adele Bell
Contact: 07904747610

- 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



524 Concern/SG slips and 'Not Safeguarding Group' is an opposite Group to restrict who can complete certain  
525 sections within the Concern/SG slips.

526 6.13. Where reasonably possible, schools and colleges hold **more than one emergency contact number for**  
527 **each pupil or student.** This goes beyond the legal minimum. It is good practice to give the school or  
528 college additional options to make contact with a responsible adult when a child missing education is also  
529 identified as a welfare and/or safeguarding concern.

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

531 6.14. This is about managing cases of allegations that might indicate a person could pose a risk of harm if they  
532 continue to work in regular or close contact with children in their present position, or in any capacity with  
533 children in a school or college. This guidance should be followed where it is alleged that anyone working  
534 in the school or college that provides education for children under 18 years of age, including supply  
535 teachers and volunteers has:

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

542 6.15. The harm test is explained on the [Disclosure and Barring service website on GOV.UK. Section 31\(9\) of the](#)  
543 [Children Act 1989 as amended by the Adoption and Children Act 2002.](#)

544 6.16. The last bullet point above includes behaviour that may have happened outside of school or college that  
545 might make an individual unsuitable to work with children, this is known as transferable risk. Where  
546 appropriate an assessment of transferable risk to children with whom the person works should be  
547 undertaken. If in doubt seek advice from the local authority designated officer (LADO).

548 6.17. This above information relate to members of staff, supply staff and volunteers who are currently working  
549 in any school or college regardless of whether the school or college is where the alleged abuse took place.  
550 Allegations against a teacher who is no longer teaching should be referred to the police. Historical  
551 allegations of abuse should also be referred to the police.

#### 552 **Children potentially at greater risk of harm**

553 6.18. Many children and young people in our services (Education and care) organisation have an allocated  
554 social worker due to safeguarding or welfare needs.

555 6.19. Children may need this help due to abuse, neglect and complex family circumstances. A child's  
556 experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally  
557 disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

558 6.20. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this  
559 information so that decisions can be made in the best interests of the child's safety, welfare and  
560 educational outcomes. This should be considered as a matter of routine. There are clear powers to share  
561 this information under existing duties on both local authorities and schools and colleges to safeguard and  
562 promote the welfare of children.

563 6.21. Where children need a social worker, this should inform decisions about safeguarding (for example,  
564 responding to unauthorised absence or missing education where there are known safeguarding risks) and  
565 about promoting welfare (for example, considering the provision of pastoral and/or academic support,

566 alongside action by statutory services). Schools/colleges must follow missing from education protocol  
567 agreed with their LA.

## 568 **Unexplained body marks**

569 6.22. Whilst Individuals are in our care there may be occasions where minor injuries occur such as bruises,  
570 swellings, cuts and scratches which by and large will be as a result of daily activities or for some Individuals  
571 as a result of self-injurious behaviour. However, all marks or physical changes must be recorded  
572 appropriately using (number to be added) weekly body chart. A Concern form must be completed for all  
573 unexplained marks and physical changes and passed to the DSL (or a deputy) along with copies of the last  
574 3 days of Daily Diary notes and Activity Records. Parents/carers and social workers should always be kept  
575 informed. Concern log should be updated with concern and relevant reference number provided to  
576 concern.

577 6.23. The flowchart provided in - **25.14 Guidance for Investigating Unexplained Body marks** indicates the  
578 correct course of action for dealing with unexplained body marks.

579 6.24. The DSL will assign a manager to investigate the concern to ascertain the reason for the marks and if no  
580 reasonable explanation can be given the DSL must contact the Safeguarding Authority/LADO for further  
581 advice and mutual conclusion as to whether the matter should be treated as a Safeguarding Concern.

582 6.25. If the concern is considered to be a safeguarding concern, then safeguarding tracking pack must be  
583 opened and safeguarding process followed.

584 6.26. If the concern is considered not to be a safeguarding concern, then the concern investigation outcome  
585 must be shared with social worker and parents.

## 586 **Disclosure from an Individual**

587 6.27. Staff must follow the process outlined in **Appendix 3. Child Protection and safeguarding flowchart**  
588 **procedure.**

589 6.28. It is important to note that children/young people may not find it easy to tell staff about their abuse  
590 verbally. Children/young people can show signs or act in ways that they hope adults will notice and react  
591 to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a  
592 member of school or college staff may overhear a conversation that suggests a child has been harmed or  
593 a child's/young person's own behaviour might indicate that something is wrong. If staff have any  
594 concerns about a child's/young person's welfare, they should act on them immediately rather than wait  
595 to be told and follow the procedure described in **Appendix 3. Child Protection and safeguarding**  
596 **procedure.**

597 6.29. In case of reports of sexual violence and sexual harassment between children and young people, these  
598 are extremely complex to manage. It is essential that victims are protected, offered appropriate support  
599 and every effort is made to ensure their education and care is not disrupted. It is also important that  
600 other children, young people and staff are supported and protected as appropriate.

601 6.30. The service's initial response to a report from a child is incredibly important. How the staff respond to a  
602 report can encourage or undermine the confidence of future victims of sexual violence and sexual  
603 harassment to report or come forward.

604 6.31. If the child/young person make a disclosure - **Listen** to what they have to say and take them seriously.  
605 Reassure them but do not promise to keep it a secret. Not promising confidentiality at this initial stage  
606 as it is very likely a concern will have to be shared further (for example, with the DSL and Safeguarding  
607 Authority) to discuss next steps. Staff should only share the report with those people who are necessary  
608 in order to progress it. It is important that the victim understands what the next steps will be and who  
609 the report will be passed to.

610 6.32. **Reflect back**, using the child's language, being non-judgmental, being clear about boundaries and how  
611 the report will be progressed, don't ask leading questions and only prompt the child where necessary

612 with open questions – where, when, what, etc. It is important to note that whilst leading questions should  
613 be avoided, staff can ask children if they have been harmed and what the nature of that harm was.

614 6.33. **Recognise** that a child is likely to disclose to someone they trust: this could be anyone on the school or  
615 college staff. It is important that the person to whom the child discloses recognises that the child has  
616 placed them in a position of trust. They should be supportive and respectful of the child.

617 6.34. **Consider** the best way of making a record of the report. Best practice is to wait until the end of the report  
618 and immediately write up a thorough summary. This allows the staff member to devote their full  
619 attention to the child and to listen to what they are saying. It may be appropriate to make notes during  
620 the report (especially if a second member of staff is present). However, if making notes, staff should be  
621 conscious of the need to remain engaged with the child and not appear distracted by the note taking.  
622 Either way, it is essential a written record is made using Concern form which is part of this policy. The  
623 written record must be fully completed within maximum of 24 hours of the disclosure, but verbal report  
624 to the DSL must be completed within an hour from the moment of the disclosure being made.

625 6.35. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of  
626 the note taker. Staff should be aware that notes of such reports could become part of a statutory  
627 assessment by Safeguarding Authority and/or part of a criminal investigation.

628 6.36. In cases where either a child/young person informs the staff that an act of FGM – however described –  
629 has been carried out on her, or where the staff observes physical signs on a girl appearing to show that  
630 an act of FGM has been carried out these situations, the DSL must be informed, who will trigger child  
631 protection/safeguarding procedures described in this policy and contact the Police. If a child/young  
632 person is at immediate risk – the Police (999) must be contacted immediately. If a child/young person  
633 required medical attention follow steps identified in ‘**Setting priorities**’ section below.

634 6.37. Remember, **do not**:

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

640 6.38. The procedure for reporting concern is described in **Appendix 8. DSL/DSL Deputy – actions, reporting**  
641 **and recording procedure.**

642 6.39. All staff know that they can contact the Local Authority direct should that be necessary. Where a  
643 safeguarding issue is raised for a young adult, the matter should be dealt with by the Local Safeguarding  
644 Adult Board. Where someone is over 18 but still receiving children’s services, the matter should be dealt  
645 with by the local Safeguarding Adult Board.

646 6.40. For allegation made against a staff member or senior managers/directors follow relevant allegations  
647 procedures described later on in this policy.

648 6.41. Where contact is made with the Local Authority in which Cambian Beverley School is geographically  
649 located, contact will also be made with the individual’s own Local Authority and also the child/young

650 person's social worker. This will be completed by one of the members of the school/college/home's  
651 safeguarding team.

652 6.42. In the case of serious harm, and/or the Individual is in immediate danger the local Police should be  
653 informed immediately and they can take immediate protective action as necessary.

654 6.43. If a member of staff feels their concerns are not being taken seriously then they are to inform a more  
655 senior manager, a Director of the Company or contact Ofsted/CQC/CIW/Estyn, the local safeguarding  
656 boards, the police or the **Whistleblowing Hotline – on 0800 086 9128.**

#### **Risk Assessment**

658 6.44. When there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk  
659 and needs assessment. Where there has been a report of sexual harassment, the need for a risk  
660 assessment should be considered on a case-by-case basis. The risk and needs assessment should  
661 consider:

- 662 • The victim, especially their protection and support,
- 663 • Whether there may have been other victims,
- 664 • The alleged perpetrator(s); and
- 665 • All the other children, (and, if appropriate, adult students and staff) at the school or college  
666 especially, and any actions that are appropriate to protect them from the alleged  
667 perpetrator(s), or from future harms.

668 6.45. Risk assessments should be recorded (written or electronic) and should be kept under review. At all times,  
669 staff should be actively considering the risks posed to all their pupils and students and put adequate  
670 measures in place to protect them and keep them safe. The DSL (or a deputy) should ensure they are  
671 engaging with Safeguarding Authority and specialist services as required. Where there has been a report  
672 of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence  
673 specialists will be required. The above school or college risk assessment is not intended to replace the  
674 detailed assessments of expert professionals. Any such professional assessments should be used to  
675 inform the school's or college's approach to supporting and protecting their pupils and students and  
676 updating their own risk assessment.

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

678 6.46. Important considerations will include:

- 679 • The wishes of the victim in terms of how they want to proceed. This is especially important in  
680 the context of sexual violence and sexual harassment. Victims should be given as much control  
681 as is reasonably possible over decisions regarding how any investigation will be progressed and

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

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

- The ages of the children involved;

- The developmental stages of the children involved;

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

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

That sexual violence and sexual harassment can take place within intimate personal relationships between peers;

- Are there ongoing risks to the victim, other children, adult students or school or college staff; and

- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

## Options to manage the report

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

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

- Manage internally;** In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

- Early help:** In line with the above, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent

escalation of sexual violence. It is particularly important that the DSL (and their deputies) know what the Early Help process is and how and where to access support.

- **Referrals to Safeguarding Authority** - where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to the local Safeguarding Authority. At the point of referral, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- **Reporting to the Police** - any report to the police will generally be in parallel with a referral to children's social care (as above. It is important that the DSL and their deputies) are clear about the local process for referrals and follow that process.

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

#### **Unsubstantiated, unfounded, false or malicious reports**

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

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

#### **Safeguarding and supporting the victim**

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

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

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

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

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

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

#### **Safeguarding and supporting the alleged perpetrator(s)**

6.59. Advice about safeguarding and supporting the alleged perpetrators is also set out in departmental advice: [Sexual violence and sexual harassment between children at schools and colleges.](#) The following principles



776 are based on effective safeguarding practice and should help shape any decisions regarding safeguarding  
777 and supporting the alleged perpetrator(s):

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

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

788 • Consider the proportionality of the response. Support (and sanctions) should be  
789 considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet  
790 needs (in some cases these may be considerable) as well as potentially posing a risk of harm  
791 to other children. HSB in young children may be (and often are) a symptom of either  
792 their own abuse or exposure to abusive practices and or materials.

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

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

800 6.60. More information in relation to this section can be found in [KCSIE 2021 Part 5 para 464](#).

## 801 **Setting priorities**

802 6.61. The priority, at all stages throughout the child protection or safeguarding process, is the interests and  
803 safety of the individual.

804 6.62. Where appropriate, any concerns will be discussed with the Individual's family / carers and where  
805 possible their agreement will be sought to making a referral to the Local Authority. However, where  
806 there is a conflict of interests between the Individual and parent/guardian, the interests of the Individual  
807 must take priority and Beverley School reserves the right to contact the Individual's local authority, Social  
808 Care or the Police, without notifying parents/carers if this is in their best interests.

809 6.63. If an urgent medical attention or advice is required and GP/speciality doctor is not available, staff MUST  
810 use the NHS 111 service. NHS 111 is available 24 hours a day, 7 days a week.

811 6.64. If the situation is life - threatening, staff must call 999 immediately and ask for an ambulance.  
812 Alternatively, if it's assessed to be in the best interest of the child/young person - the DSL MUST take the  
813 Individual to the Accident and Emergency Unit at the nearest hospital, having first notified the Local  
814 Authority/Police, remembering that every reasonable effort should be made to inform the parents/carers  
815 as soon as possible.

816 6.65. If the suspected abuse is sexual, then the medical professional must determine if the medical examination  
817 should be delayed until the Local Authority and the Police can liaise with the hospital. There is a possibility  
818 that the needs of the young person are such that medical attention is the priority, in such case medical  
819 professional's judgment must be followed. There must at all times be an Appropriate adult (parent  
820 guardian or a social worker) with the individual whether from the Individual's care home/school/college,

821 the Local Authority or the Police, if the parents/carers are not included. This section must be read in  
822 conjunction with our **0.29. Child Sexual Exploitation policy**.

823 6.66. Cambian will provide an advocate to each Individual where appropriate, if they are unable to speak for  
824 themselves without support or an Independent Mental Capacity Advocate (IMCA) if subject to MCA.  
825 Further information on MCA are available in our **0.13. Mental Capacity and Consent policy**.

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

827 6.67. All Individuals involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for  
828 dealing with such abuse will be followed, where there is 'reasonable cause to suspect that an Individual  
829 is suffering or likely to suffer significant harm'. DSL must refer peer on peer abuse to a Safeguarding  
830 Authority, local Authority and Regulator.

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

832 6.68. If we were given information that suggested that someone who does not reside at or attends our location  
833 has been abused by one of our members of staff, the DSL would immediately report this to the Local  
834 Authority and LADO. The Head of Service must be kept informed and HR Business Partner consulted.  
835 Should the staff member be involved we would then formally advise the member of staff of the allegation,  
836 making it clear that we would not play any part in the investigatory process. The employee would be  
837 advised of the possibility of facing suspension, re-assignment to other duties (to manage any perceived  
838 risks) etc., in exactly the same way as if the allegation had involved an Individual at our  
839 home/school/college. However, HR Business Partner must be consulted before any action is taken. If the  
840 allegation is subsequently proved to be unfounded, he or she would be given full support in resuming  
841 their career. Should we be asked by LADO/Safeguarding authority to be involved in any potential  
842 investigations or parts of it, a HR Business Partner will have to be consulted first. At this point an  
843 assessment will need to be made to identify what detail (if any) can be disclosed to a member of staff  
844 involved.

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

846 6.69. If we were given information that suggested that someone who does not reside at or attends our location  
847 has been abused by a third party (known or unknown to the provision), the DSL would immediately report  
848 this to the Local Authority and Police. The Head of Service must be kept informed. DSL will follow advice



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

### 8Allegations against staff

852 6.70. All allegations must be reported to the DSL Ann Marie Edwards or in their absence to a DSL Deputy –  
853 Adele Bell see your local Safeguarding poster. Also, where appropriate - HR Business Partner must be  
854 consulted.

855 6.71. When an allegation is made against a member of staff, set procedures must be followed, see the flow  
856 chart in **Appendix 3. Child Protection and safeguarding procedure (Flow chart).**

857 6.72. Staff MUST act on every allegation, all repeated allegations must be treated as new and carefully assessed  
858 and investigated. Staff who are the subject of an allegation have the right to have their case dealt with  
859 fairly, quickly and consistently and to be kept informed of its progress.

860 6.73. Staff should refer to the **25.08.Guidance for staff who have the allegation made against them** provided  
861 for what to do in the event an allegation is made against them.

### 8Allegations against staff in Education

863 6.74. The staff in this section include teachers and TAs, supply teachers, other staff, volunteers and contractors.  
864 KCSiE2021 splits the type of allegations into two groups:

865 • Allegations that may meet the harms threshold (see **LADO referral criteria (KCSiE2021) –**  
866 **meeting the harm threshold** of this policy)

867 • Allegation/concerns that do not meet the harms threshold – referred in the guidance and  
868 this policy as ‘low level concerns’.

869 6.75. This is about managing cases of allegations that might indicate a person would pose a risk of harm if they  
870 continue to work in regular or close contact with children in their present position, or in any capacity with  
871 children in a school or college. The KCSiE2021 guidance should be followed where allegations are made  
872 against anyone working in the school or college that provides education for children under 18 years of  
873 age, including supply teachers and volunteers.

874 6.76. The information above relate to members of staff, supply staff, volunteers and contractors who are  
875 currently working in any school or college regardless of whether the school or college is where the alleged  
876 abuse took place. In Education allegations against people listed above should be referred to the  
877 Head/Principal who is often the DSL, however where the Head/Principal is not the DSL, allegations against  
878 staff including supply, volunteers and contractors must be referred to the Head/Principal. This is because  
879 the concern/allegation may align with other performance or personal related issues the Head/Principal  
880 might already be aware of, whereas the DSL may not be. The Principal/Head should ensure the DSL is  
881 briefed as appropriate and will then decide who the case should be led by – the DSL or themselves.  
882 Allegations against a teacher who is no longer teaching should be referred **to the police** and HR Business  
883 Partner advised.

884 6.77. Where an adult makes an allegation to a school or college that they were abused as a child, the individual  
885 should be advised to report the allegation to the police. Non recent allegations made by a child, should  
886 be reported to the LADO in line with the local authority’s procedures for dealing with non-recent  
887 allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no  
888 matter how long ago it happened.

889 6.78. Where a teacher’s employer, including an agency, dismisses or ceases to use the services of a teacher  
890 because of serious misconduct, or might have dismissed them or ceased to use their services had they  
891 not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching

892 Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found  
893 on GOV.UK.

## 8 Allegations against supply teachers and all workers supplied by agency

895 6.79. In some circumstances schools and colleges will have to consider an allegation against an individual not  
896 directly employed by them, where its disciplinary procedures do not fully apply because agencies will  
897 have their own policies and procedures; for example, supply teachers or contracted staff provided by an  
898 employment agency or business.

899 6.80. Whilst The Organisation's schools and colleges are not the employer of supply teachers, they should  
900 ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease  
901 to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the  
902 LADO to determine a suitable outcome. Schools and colleges must also consult HR Business Partner who  
903 may advise further. Governing bodies and proprietors should discuss with the supply agency or agencies  
904 where the supply teacher is working across a number of schools of colleges, whether it is appropriate to  
905 suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry  
906 out their investigation.

907 6.81. Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or  
908 children's social care. The school or college will usually take the lead because agencies do not have direct  
909 access to children or other school or college staff, so they will not be able to collect the facts when an  
910 allegation is made, nor do they have all the relevant information required by the LADO as part of the  
911 referral process.

912 6.82. When using a supply agency, schools and colleges should inform the agency of its process for managing  
913 allegations but also take account of the agency's policies and investigatory process and their duty to refer  
914 to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or  
915 equivalent to meetings and keeping them up to date with information about its policies. It is important  
916 we not blur the lines of employment, so in case there is any confusion, HR Business Partner should be  
917 consulted.  
918

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

920 6.83. All allegations must be reported to:

921 - Education division: Regional Education Lead Kicha Mitchell unless within residential education  
922 Registered Manager is the DSL in which case the matter will be referred to the Head/ Principal. For  
923 the DSL fulfilling the role as their substantive role, all allegations must be reported to the  
924 Principal/Head.

925 - Children's residential care division: Regional Manager Sue Fitzsimmons unless Regional Manager is  
926 the DSL in which case the matter will be referred to the Managing Director.

927 6.84. Depending on the division and who is the service DSL, people notified of allegation made (see above) will  
928 then refer the matter to Local Safeguarding Authority/LADO and notify their line manager:

929 Education division: Regional Education Lead **Kicha Mitchell** or

930 Managing Director for Education]. **Andrew Sutherland**

931 In Independent schools – the Proprietor must also be notified. **Farouq Sheikh**

932 Children's residential care division: Managing Director **Laura Fearon**

933 The person who referred the matter to Local Safeguarding Authority/LADO in line with agreed course of  
934 action will make a decision about who will lead the case including management investigation – should

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

937 6.85. In residential education associated with children's homes/care homes the Responsible/Nominated  
938 Individual MUST also be notified.

939 6.86. Services using Behaviour Watch system – allegations made against the DSL or DSL Deputy who have full  
940 access to the system including Concern/Safeguarding function, should not be initially entered to the  
941 system, but recoded on the policy associated Concern form and Safeguarding Tracking Pack as they would  
942 have been prior to implementation of the Behaviour Watch. This is to ensure that no one, including those  
943 who are part of the service's Safeguarding Team are able to see the details of their own case which could  
944 have a detrimental impact on the investigation itself and the outcome of it. However, once the case has  
945 been concluded, a decision should then be made about whether or not the detail related to the case  
946 should be retrospectively entered in to Behaviour Watch or kept in the original format. Such a decision  
947 should be made by the Case Manager, Managing Director and a member of HR Team. Should a decision  
948 be made to keep it in the original format, a Concern/SG slip in the Behaviour Watch must still be  
949 retrospectively opened and a note added to reflect that there was an allegation made against the DSL/DSL  
950 Deputy but without specifying any further detail about the character of the allegation. Instead a reference  
951 number of the case and location of the pack related to the case is provided. This action will ensure that  
952 the case has been captured in the system which will then allow the service to generate a log with accurate  
953 numbers of concerns and safeguarding cases for the service.

#### **9 Allegations against the Regional Manager/other Regional staff**

955 6.87. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
956 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this,  
957 the allegation should be passed to the identified senior person to follow through with Local Safeguarding  
958 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will  
959 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
960 gathering any information or, should it be required, in the actual investigation in relation to a senior  
961 member.

962 6.88. Allegations not linked to specific site must be reported to Managing Director who will refer the matter to  
963 Local Safeguarding Authority/LADO and act in line with agreed course of action.

964 6.89. The appropriate HR Business Partner should be notified, so they can advise and where required - support  
965 the investigation.

#### **9 Allegations against the Managing Director**

967 6.90. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
968 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this,  
969 the allegation should be passed to the identified senior person to follow through with Local Safeguarding  
970 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will  
971 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
972 gathering any information or, should it be required, in the actual investigation in relation to a senior  
973 member.

974 6.91. Allegations not linked to specific site must be reported to Chief Operating Officer who will refer the  
975 matter to Local Safeguarding Authority/LADO and act in line with agreed course of action.

976 6.92. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### **9 Allegations against any other Senior Leader**

978 6.93. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
979 Head/Principal) who will make the initial referral to Local Safeguarding Authority/LADO Following this,  
980 the allegation should be passed to the identified senior person to follow through with Local Safeguarding  
981 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will  
982 retain the responsibility to report the initial concern, but will have no further part in the process regarding

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

985 6.94. Allegations not linked to specific site must be reported to the person's (whom allegation is made against)  
986 line manager who will refer the matter to Local Safeguarding Authority/LADO and act in line with agreed  
987 course of action.

988 6.95. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### 989 **Allegations against the Chief Operating Officer / Head of Children's Services**

990 6.96. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
991 Head/Principal) who will make the initial referral to local Safeguarding Authority/LADO. Following this,  
992 the allegation should be passed to the identified senior person to follow through with Local Safeguarding  
993 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will  
994 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
995 gathering any information or, should it be required, in the actual investigation in relation to a senior  
996 member.

997 6.97. Allegations not linked to specific site must be reported to the Chair of the Care Governance Committee -  
998 **Moir Livingstone** - who will refer the matter to Local Safeguarding Authority/LADO and act in line with  
999 agreed course of action.

1000 6.98. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### 1001 **Allegations against the Chief Executive Officer**

1002 6.99. Any allegations linked to the site, must be reported to the DSL of the site (In Education – the  
1003 Head/Principal) who will make the initial referral to Local Safeguarding Authority/LADO Following this,  
1004 the allegation should be passed to the identified senior person to follow through with Local Safeguarding  
1005 Authority/LADO and subsequently act in line with agreed course of action. This means that the DSL will  
1006 retain the responsibility to report the initial concern, but will have no further part in the process regarding  
1007 gathering any information or, should it be required, in the actual investigation in relation to a senior  
1008 member.

1009 6.100. Allegations not linked to a specific site must be reported to the Chair of the Care Governance Committee  
1010 - **Moir Livingstone** who will refer the matter to Local Safeguarding Authority/LADO and act in line with  
1011 agreed course of action.

1012 6.101. The Head of HR should be notified, so they can advise and where required - support the investigation.

#### 1013 **Low level concerns**

1014 6.102. As part of their whole school approach to safeguarding, schools and colleges should ensure that they  
1015 promote an open and transparent culture in which all concerns about all adults working in or on behalf  
1016 of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly  
1017 and appropriately.

1018 6.103. Creating a culture in which all concerns about adults (including allegations that do not meet the harms  
1019 threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is  
1020 critical. If implemented correctly, this should encourage an open and transparent culture; enable schools  
1021 and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of  
1022 abuse; and ensure that adults working in or on behalf of the school or college are clear about professional  
1023 boundaries and act within these boundaries, and in accordance with the ethos and values of the  
1024 institution.

1025 6.104. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards  
1026 a child does not meet the threshold set out in **LADO referral criteria (KCSIE2021) – meeting the harm**

1027 **threshold section. If there is any doubt about whether or not the concern meets LADO referral criteria**  
1028 **– LADO should be contacted and advice sought.**

1029 6.105. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of  
1030 unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have  
1031 acted in a way that:

- 1032 • Is inconsistent with the staff code of conduct, including inappropriate conduct outside of  
1033 work; and
- 1034 • Does not meet the allegations threshold or is otherwise not considered serious enough to  
1035 consider a referral to the LADO

1036 6.106. Examples of such behaviour could include, but are not limited to:

- 1037 • Being over friendly with children;
- 1038 • Having favourites;
- 1039 • Taking photographs of children on their mobile phone (this depend on the circumstances,  
1040 so it would require DSL assessment and LADO advice)
- 1041 • Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- 1042 • Using inappropriate sexualised, intimidating or offensive language.

1043 6.107. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may  
1044 look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately  
1045 intended to enable abuse.

1046 6.108. It is crucial that any such concerns, including those which do not meet the harm threshold (see [Part Four](#)  
1047 [- Section one](#)), are shared responsibly and with the right person, and recorded and dealt with  
1048 appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf  
1049 of schools and colleges from potential false allegations or misunderstandings.

## 1050 **The initial response to allegation**

1051 6.109. Where the school or college identifies a child/young person has been harmed, that there may be an  
1052 immediate risk of harm to a child/young person or if the situation is an emergency, they should contact  
1053 the Safeguarding Authority and as appropriate the police immediately as per the processes. There are  
1054 two aspects to consider when an allegation is made:

- 1055 • **Looking after the welfare of the child** - the DSL is responsible for ensuring that the child is  
1056 not at risk and referring cases of suspected abuse to the local authority children’s social  
1057 care as described in Part one of this guidance.
- 1058 • **Investigating and supporting the person subject to the allegation** - the case manager  
1059 should discuss with the LADO, the nature, content and context of the allegation, and agree  
1060 a course of action.

1061 6.110. When dealing with allegations, schools and colleges should:

- 1062 • Apply common sense and judgement
- 1063 • Deal with allegations quickly, fairly and consistently; and
- 1064 • Provide effective protection for the child and support the person subject to the allegation.

1065 6.111. Schools and colleges should ensure they understand the local authority arrangements for managing  
1066 allegations, including the contact details and what information the LADO will require when an allegation  
1067 is made. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with

1068 local procedures to establish the facts to help them determine whether there is any foundation to the  
1069 allegation, being careful not to jeopardise any future police investigation. For example:

- 1070 • Was the individual in the school or college at the time of the allegations?
- 1071 • Did the individual, or could they have, come into contact with the child?
- 1072 • Are there any witnesses? and,
- 1073 • Was there any CCTV footage?

1074 6.112. These are just a sample of example questions. Services should be familiar with what initial information  
1075 the LADO will require. This information can be found in local policy and procedural guidance provided by  
1076 the LADO service. Any enquiries of this nature must be carefully recorded and dated so they can be shared  
1077 with the HR department to support any investigation.

1078 6.113. When to inform the individual of the allegation should be considered carefully on a case by case basis,  
1079 with guidance as required from the LADO, and if appropriate Safeguarding Authority and the police.

1080 6.114. If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion  
1081 involving the police and/or children's social care will be convened in accordance with the statutory  
1082 guidance [Working Together to Safeguard Children](#).

1083 6.115. Where it is clear that an investigation by the police or Safeguarding Authority is unnecessary, or the  
1084 strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps  
1085 with the case manager (A 'case manager' will be the person leading any investigation. This will be either the  
1086 DSL/DSL Deputy which is often the Principal/Head/Registered Manager or, where the case manager is  
1087 the subject of an allegation, it will be the Proprietor or a Director nominated by them). A LADO should be  
1088 informed who will lead investigation to ensure there is no conflict of interest or any other concerns  
1089 related to the choice of the case manager.

#### 1090 **No Further Action**

1091 6.116. Where the initial discussion initial discussion leads to no further action, the case manager and the LADO  
1092 should:

- 1093 • Record the decision and justification for it; and,
- 1094 • Agree on what information should be put in writing to the individual concerned and by  
1095 whom.

#### 1096 **Further enquiries**

1097 6.117. Where further enquiries are required to enable a decision about how to proceed, the LADO and case  
1098 manager should discuss how and by whom the investigation will be undertaken. In straightforward cases,  
1099 the investigation should normally be undertaken by a senior member of the school's or college's staff.

1100 6.118. Where there is a lack of appropriate resource within the school or college, or the nature or complexity  
1101 of the allegation requires it, the allegation will require a senior member of the off-site team: Regional  
1102 Manager (Education or Care), a Director, HR Business Partner or an independent investigator if  
1103 appropriate.

1104 6.119. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as  
1105 possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals,  
1106 depending on the complexity of the case.

1107 6.120. Wherever possible, the first review should take place no later than four weeks after the initial  
1108 assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review  
1109 meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges  
1110 when considering allegations against adults working with children. The LADO's role is not to investigate



1111 the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police,  
1112 children's social care, the school or college, or a combination of these.

### 1113 **Suspension**

1114 6.121. Suspension should not be an automatic response when an allegation is reported. All options to avoid  
1115 suspension should be considered prior to taking that step. The case manager must consider carefully  
1116 whether the circumstances warrant suspension from contact with children at the school or college, or  
1117 until the allegation is resolved. It should be considered only in cases where there is cause to suspect a  
1118 child or other children at the school or college is/are at risk of harm, or the allegation could be considered  
1119 as gross or serious misconduct. Prior to any suspension, the case manager must consult with their HR  
1120 Business Partner and the LADO, as well as the police and Safeguarding Authority where they have been  
1121 involved. More information on suspension and associated process can be found in [KCSIE 2021 Part 4 page](#)  
1122 [86 – 87.](#)

### 1123 **Supporting those involved**

1124 6.122. The welfare of a child/young person is paramount (how children should be protected and supported is  
1125 set out throughout KCSIE2021 guidance) and this will be the prime concern in terms of investigating an  
1126 allegation against a person in a position of trust. However, when an allegation or safeguarding concern is  
1127 being investigated it is likely to be a very stressful experience for the adult subject of the investigation,  
1128 and potentially for the family members. It is important that an employer offers appropriate welfare  
1129 support at such a time and recognises the sensitivity of the situation. Information is confidential and  
1130 should not ordinarily be shared with the other staff or with children or parents who are not directly  
1131 involved in the investigation. More about employers duty of care to their employees can be found in  
1132 [KCSIE2021 part 4/Duty of care.](#)

1133 6.123. Staff whom allegation/s have been made against must always be supported and if suspended they will  
1134 receive a support person (nominated contact), any suspension is not an indication of guilt.

### 1135 **Allegation outcomes**

1136 6.124. The definitions that should be used when schools and colleges determine the outcome of an allegation  
1137 are set out below:

- 1138 • Substantiated: there is sufficient evidence to prove the allegation;
- 1139 • Malicious: there is sufficient evidence to disprove the allegation and there has been a  
1140 deliberate act to deceive or cause harm to the person subject of the allegation;
- 1141 • False: there is sufficient evidence to disprove the allegation;
- 1142 • Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation.  
1143 The term, therefore, does not imply guilt or innocence; or
- 1144 • Unfounded: to reflect cases where there is no evidence or proper basis which supports the  
1145 allegation being made.

1146 6.125. It should be noted that these definitions are available to support the decision-making process. However,  
1147 in certain cases, in the absence of any substantiating evidence, the Company may still progress through  
1148 the formal disciplinary procedure if there are reasonable grounds to do so, or there is a reasonable belief  
1149 that an employee has committed an act of misconduct.

1150 6.126. Ultimately the options open to the school or college depend on the nature and circumstances of the  
1151 allegations and the evidence and information available. This will range from taking no further action, to  
1152 dismissal or a decision not to use the person's services in future. Suspension should not be the default

1153 position, an individual should be suspended only if there is no reasonable alternative ([see paragraphs](#)  
1154 [361-368 on suspension](#)).

## 1155 Serious incident reporting

1156 6.127. In addition to all regulatory reporting requirements, all serious incidents will be escalated and reported  
1157 as outlined in **035. SUI Part 1 – Risk Categories - Reference form and SUI Part 2 –Briefing form.**

## 1158 Death of someone in our care including rapid response to unexpected death

1159 6.128. In case of **unexpected death** of a child/young person/adult in Cambian services all staff to follow the  
1160 rapid response process described below:

- 1161 • **Call the Ambulance and Police**
- 1162 • Unless the 999 operator tells you to, do not touch the person, do not move anything around them  
1163 which may form part of forensic evidence. Police will make a decision about the forensic examinations  
1164 and appropriate security of the scene.
- 1165 • DSL will contact Safeguarding Authority and follow the Serious Untoward Incidents (SUI) reporting  
1166 procedure. The DSL will contact the Managing Director of the division they work in and verbally inform  
1167 them of what happened before completing SUI Part 2.
- 1168 • DSL will contact Children's/Adults Social Care Team
- 1169 • Where there is a suicide/suspected suicide then Child & Adolescent Mental Health Services (CAMHS)  
1170 should also be notified by the Safeguarding Authority.

1171 6.129. Once the above rapid steps have been taken, further steps described below must be followed.

1172 6.130. In the event of the death of an Individual in one of our homes/schools/colleges we must notify the  
1173 following within 24 hours:

- 1174 • Chief Operating Officer, Managing Director, Responsible/Nominated Individual, Regional Manager  
1175 following the **35.01. Caretech Children's services SUI process.**
- 1176 • Next of kin/parents/carer of the deceased.
- 1177 • Where the death of an individual occurs in an education location the assistance of the local police and  
1178 social services department should be sought in informing the parents/guardians.
- 1179 • The appropriate regulatory body: e.g. Ofsted, CQC, CIW, Estyn
- 1180 • Ministry of justice if applicable.
- 1181 • The placing authority/authorities.
- 1182 • The local authority responsible for Social Services and Education (where the death takes place in a  
1183 registered school) within whose area the education location is situated.
- 1184 • The District Health Authority within whose area the education location is situated.
- 1185 • The Department for Education, (where the death takes place in a registered school).
- 1186 • The Health and Safety Executive.

## 1187 Abuse of position of trust

1188 6.131. All staff are aware that inappropriate behaviour towards those in our care is unacceptable. In addition,  
1189 staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the  
1190 age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a  
1191 position of trust, even if the relationship is consensual. This means that any sexual activity between a



1192 member of the staff and a young person under 18 may be a criminal offence, even if that young person  
1193 is over the age of consent.

#### 1194 **Visitors**

1195 6.132. All authorised visitors will be required to sign in and out, and wear a visitor or identity badge at all times.  
1196 All unauthorised visitors will be challenged by staff and reported to the home manager/head/principal  
1197 before entry is authorised.

#### 1198 **Volunteers**

1199 6.133. Volunteers undergo checks commensurate with their work in the home/school/college and contact with  
1200 children, young people and adults i.e. if they are in regulated activity or not.

#### 1201 **Contractors**

1202 6.134. We will check the identity of all contractors working on site and requests the full range of DBS and other  
1203 required checks where they work in regulated activity or unsupervised in accordance with the latest  
1204 government guidance.

#### 1205 **Use of school or college premises for non-school/college activities**

1206 6.135. Where governing bodies or proprietors hire or rent out school or college facilities/premises to  
1207 organisations or individuals (for example to community groups, sports associations, and service providers  
1208 to run community or extra-curricular activities) they should ensure that appropriate arrangements are in  
1209 place to keep children safe. More information can be found in [KCSIE2021 Part 2 para 155 & 156](#).

#### 1210 **Extended school and off-site arrangements**

1211 6.136. Where extended off-site activities are provided by and managed by us, our safeguarding policy and  
1212 procedures apply. If other organisations provide services or activities on our site we will check that they  
1213 have appropriate policies and procedures in place, including safer recruitment procedures and clarify  
1214 whose procedure is to be followed if there are concerns. There will be clear communication channels to  
1215 ensure the DSL is kept appropriately informed.

1216 6.137. When our Individuals are doing off-site activities, including day and residential visits and work related  
1217 activities, we will risk assess and check that effective safeguarding arrangements are in place. The DSL  
1218 will be kept appropriately informed.

#### 1219 **Use of mobile phones**

1220 6.138. Staff must behave in accordance with the **GHR 11. Staff Code of Conduct** and Internet and social media  
1221 access including **Pro 01. Mobile Telephony Policy** at all times.

1222 6.139. All computer equipment and internet access within the home/school/college is subject to 'parental  
1223 controls' and internet safety rules in line with our **0. 27. E-safety policy** including internet and social  
1224 media access and **0.21. Anti-bullying policy**. Staff should not use any computer for personal reasons

1225 during working hours. Staff need to help our Individuals to prepare for the hazards whilst promoting the  
1226 many learning and social opportunities available through the internet and social media.

1227 6.140. If staff contribute to internet blogs or access social media networking sites e.g. Facebook, they MUST  
1228 neither mention Beverley School or make reference to their employment at the school. Staff are advised  
1229 not to communicate with parents, guardians, carers or Individuals via social networking sites

## 1230 Photography and images

1231 6.141. This section should be read in conjunction to our **GIG 02. Data Protection policy**.

1232 6.142. The vast majority of people who take or view photographs or videos of Individuals do so for entirely  
1233 innocent and acceptable reasons. Sadly, some people abuse children or vulnerable young people through  
1234 taking or using images, so we have some safeguards in place.

1235 6.143. To protect our children, young people or young adults we will:

- 1236 • Seek their consent for photographs to be taken or published (for example, on our website or in  
1237 newspapers or publications)
- 1238 • Seek parental consent of consent from the Individual
- 1239 • Not use their full name with an image, only their initials
- 1240 • Ensure that personal data is not shared
- 1241 • Store images appropriately, securely and for no longer than necessary
- 1242 • Only use school equipment, i.e. not personal devices
- 1243 • Encourage our children, young people and adults to tell us if they are worried about any photographs  
1244 that are taken of them

## 1245 Physical intervention and use of reasonable force

1246 6.144. All staff are encouraged to use de-escalation techniques and creative alternative strategies that are  
1247 specific to each Individual and in line with **0.45 Behaviour support policy** and **0.46 Physical Intervention**  
1248 **policy** and training. Restraint will only be used as a last resort and all incidents of this are reviewed,  
1249 recorded and monitored.

## 1250 Staff Taking Medication or other substances

1251 6.145. Staff members must not be under the influence of alcohol or any other substance which may affect their  
1252 ability to care for the Individuals. If they are taking medication they should seek medical advice and  
1253 inform the Home Manager/Head/Principal who will review the medical advice and take a decision as to  
1254 whether they are fit for work.

1255 6.146. We only allow staff to work if medical advice confirms that their ability to look after Individuals is unlikely  
1256 to be impaired. Should a member of staff need to bring their medication to the home/school/college, it  
1257 must be securely stored and out of reach of all children, young people and young adults. This section  
1258 should be read in conjunction with our **GHR 12 Drug and Alcohol Policy**.

## 1259 Information for individuals and relatives/carers

1260 6.147. Individuals and carers will be informed that their concerns or complaints will be taken seriously, be dealt  
1261 with independently and that they will be kept involved in the process to the degree that they wish to be.  
1262 They will be reassured that they will receive help and support in taking action.

1263 6.148. They will also be advised that they can nominate an advocate or representative to speak and act on their  
1264 behalf if they wish. For individuals assessed as lacking capacity to make decisions about how they could  
1265 be protected, an Independent Mental Capacity Advocate (IMCA) must be considered and may be  
1266 appointed. They will be advised of rights to legal aid in where appropriate to victim support and  
1267 compensation.

## 1268 Recruitment and vetting

1269 6.149. Our **GHR 03. Recruitment Policy** reflects Safer Recruitment guidelines and legislation in **Appendix 2.**  
1270 **Legislation and guidance** as well as carrying out further checks and precautions such as Good Conduct

1271 Certificates. HTs / Principals, DSLs and member of Recruitment team including those directly supporting  
1272 schools should read the whole KCSIE2021 guidance including Part 3 dedicated to Safer Recruitment.

1273 6.150. Each Education location maintains a **Single Central Record (SCR)**. This covers all staff including supply  
1274 teaching and teacher trainees, agency care staff as well as multisite managers and members of the  
1275 proprietor body. This is regularly audited by the school/college SLT and available for inspection.

1276 6.151. For agency workers we obtain written confirmation that all checks have been completed, in line with  
1277 safer recruitment from the employment business that is supplying the member of agency staff. All  
1278 Locations must ensure that an agreement exists between the Location and the agency to confirm that, in  
1279 the event of there being a disclosure on a DBS certificate, the Location will have sight of the certificate  
1280 before that person can begin work at the home/school/college.

1281 6.152. All Locations must check the identity of any person deemed 'supply' or 'agency' staff separately to the  
1282 agency.

1283 6.153. Where other Cambian staff (e.g. care staff) work on the same site as a school they must be subject to the  
1284 same recruitment regulations and procedures as the education staff.

### 1285 Requirements to inform Disclosure and Barring Services (DBS)

1286 6.154. The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the  
1287 barred lists is required.

1288 6.155. Services will promptly make a referral to the Disclosure and Barring Service (but no longer than one  
1289 month after leaving the Location) if a person in regulated activity has been dismissed or removed due to  
1290 safeguarding concerns, or would have been had they not resigned.

1291 6.156. In the case of a member of teaching staff at a school or sixth form college, the case manager must  
1292 consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching  
1293 [\(paragraph 143 for further information\)](#).

1294 6.157. Referrals to the Disclosure and Barring Service will be made for any person (whether employed,  
1295 contracted (e.g. supply), a volunteer or student) whose services are no longer required because he/she  
1296 is considered unsuitable to work with children and young people.

1297 6.158. This is a legal duty and failure to refer when the criteria are met is a criminal offence. More detail is  
1298 provided at paragraph 179.

1299 6.159. All Managers must read the Group leavers policy – all referrals must be recorded with HR so they can  
1300 ensure any future references are correct. The references team log referrals so this can be completed. This  
1301 will apply to both: DBS and TRA.

### 1302 Record-keeping

1303 6.160. Record keeping is an important element of safeguarding. Whenever a complaint or allegation of abuse is  
1304 made, staff must keep clear and accurate records using a Concern Form.

1305 6.161. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in  
1306 writing. Information should be kept confidential and stored securely. It is good practice to keep concerns  
1307 and referrals in a separate child protection file for each child. Schools/colleges using Behaviour Watch  
1308 have Concern/Safeguarding function to record any concerns being raised. A report per child/young  
1309 person can also be generated.

1310 6.162. Records should be factual, accurate, concise, ethical and relevant.

1311 6.163. All recording of written information should be legible and discussions with other professionals and  
1312 agencies should be recorded chronologically.

1313 6.164. There will be a safeguarding section/folder for each Individual which will hold any concerns/safeguarding  
1314 documentation for that individual. At the front of each folder there is an Index for Individual's Concerns.  
1315 This is to enable the location to keep accurate records of any concerns raised regarding the individual

1316 and aid the monitoring/ reviewing of safeguarding incidents. The folders should be kept in a secure  
1317 location.

1318 6.165. Each location apart from those using Behaviour Watch system will also maintain **25.07. Central Log of**  
1319 **Concerns and Safeguarding** of all concerns raised at the location including the safeguarding information  
1320 where the concern has escalated. Where this is held as a paper version this is to be made into a bound  
1321 booklet and completed by the DSL. If kept electronically, access is to be restricted to the DSL and deputies  
1322 only. In either case this should be kept in a secure location.

### 1323 Monitoring

1324 6.166. A quality assurance cycle operates to ensure that safeguarding incidents and notifications are recorded,  
1325 managed and responded to at the Location, at a regional level and at a whole divisional level, see **section**  
1326 **9. Accountability**. The cycle is informed by a weekly (Monday) submission of Key Performance Indicators  
1327 (KPIs) using **CambianKPI** and the identification and management of safeguarding risks. A report on the  
1328 position of every site in relation to their KPIs is produced every Wednesday.

### 1329 Training

1330 6.167. All staff will receive information regarding Child Protection and Safeguarding on induction. The induction  
1331 introduces the new staff member to the policy, procedure and practice at the location. They will also be  
1332 orientated as to where to find information regarding safeguarding including relevant posters around the  
1333 location. As part of their induction all staff are required to read this policy and confirm that they  
1334 understand their role in safeguarding and protecting young people within the service they are going to  
1335 work.

1336 6.168. All staff MUST complete mandatory safeguarding face to face or online training via MYRUS which must  
1337 be completed as part of staff member induction and annually thereafter. This should include online  
1338 safety. This is to maintain staff awareness of their responsibilities in relation to children /young  
1339 people/young adult's safeguarding.

1340 6.169. Staff will not be allowed to work with Individuals unless they have completed the above training. The  
1341 school/college/home must check that supply/agency staff have completed basic awareness training  
1342 before being allowed into contact with Individuals.

1343 6.170. Contractors and others on site who might have unsupervised access to Individuals must also complete  
1344 basic awareness training before being allowed to start work.

1345 6.171. The DSL will ensure that all staff receive regular updates regarding safeguarding policy, procedure and  
1346 practice throughout the year. This can be undertaken in various forums: as a face to face or online  
1347 session, staff meetings or workshops. In addition to this safeguarding updates are provided to schools  
1348 and colleges by the external Safeguarding Network.

1349 6.172. The DSL and DSL Deputies should undergo the same level of training providing them with the knowledge  
1350 and skills required to carry out the role. The DSL's/DSL Deputies' training should be provided by the LA  
1351 within the boundaries they operate and be refreshed at least every two years. Both should also undertake  
1352 Prevent awareness training.

### 1353 Confidentiality and information sharing

1354 6.173. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting  
1355 child's/young person's welfare, including their educational outcomes. Schools and colleges have clear  
1356 powers to share, hold and use information for these purposes. Staff should be proactive in sharing  
1357 information as early as possible to help identify, assess and respond to risks or concerns about the safety  
1358 and welfare of children/ young people whether this is when problems are first emerging, or where a child  
1359 is already known to local authority children's social care.

1360 6.174. Where the police are involved, wherever possible the school or college should ask the police to obtain  
1361 consent from the individuals involved to share their statements and evidence for use in the employer's

- 1362 disciplinary process. This should be done as their investigation proceeds and will enable the police to  
1363 share relevant information without delaying the conclusion of their investigation or any court case.
- 1364 6.175. The Safeguarding authority should adopt a similar procedure when making enquiries to determine  
1365 whether the child or children named in the allegation are in need of protection or services, so that any  
1366 information obtained in the course of those enquiries which is relevant to a disciplinary case can be  
1367 passed to the employer without delay.
- 1368 6.176. The case manager should take advice from the LADO, police and Safeguarding Authority to agree the  
1369 following:
- 1370 • Who needs to know and exactly what information can be shared;
  - 1371 • How to manage speculation, leaks and gossip
  - 1372 • What, if any, information can be reasonably given to the wider community to reduce  
1373 speculation; and
  - 1374 • How to manage press interest if, and when, it should arise.
- 1375 6.177. Exchange or disclose of personal information with other agencies will be completed in accordance with  
1376 **GIG 02. Data Protection and GIG 09. Confidentiality Code of Practice** and all relevant legislation including  
1377 the Data Protection Act 2018 and GDPR which places duty on organisations and individuals to process  
1378 personal information fairly and lawfully and to keep the information they hold safe and secure.
- 1379 6.178. Information relating to individual Safeguarding cases is confidential, although some information can be  
1380 shared with relevant staff. This should be done only on a 'need to know' basis.
- 1381 6.179. Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data  
1382 protection principles, which allow them to share (and withhold) personal information, as provided for in  
1383 the Data Protection Act 2018 and the GDPR. This includes:
- 1384 • Being confident of the processing conditions which allow them to store and share information for  
1385 safeguarding purposes, including information which is sensitive and personal, and should be treated  
1386 as 'special category personal data'.
  - 1387 • Understanding that 'safeguarding of children and individuals at risk' is a processing condition that  
1388 allows practitioners to share special category personal data. This includes allowing practitioners to  
1389 share information without consent where there is good reason to do so, and that the sharing of  
1390 information will enhance the safeguarding of a child in a timely manner but it is not possible to gain  
1391 consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent  
1392 would place a child at risk.
  - 1393 • For schools, not providing pupils' personal data where the serious harm test under the legislation is  
1394 met. For example, in a situation where a child is in a refuge or another form of emergency  
1395 accommodation, and the serious harms test is met, they must withhold providing the data in

1396 compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in  
1397 doubt schools should seek independent legal advice.

1398 6.180. When sharing safeguarding information regarding an individual, staff will need to consider the following:

1399 • Information should only be shared on a 'need to know' basis when it is in the best interests of the  
1400 individual

1401 • Informed consent should be obtained but, if this is not possible and other adults are at risk of abuse  
1402 or neglect, it may be necessary to override the requirement

1403 • Distinguish fact from opinion

1404 • Ensure you are giving the right information about the right person

1405 • Ensure you are sharing information securely

1406 • Inform the person that the information has been shared if they were not already aware of this and if  
1407 it would not create or increase risk of harm to them/others.

1408 6.181. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of  
1409 keeping children safe. Fears about sharing information must not be allowed to stand in the way of the  
1410 need to safeguard and promote the welfare and protect the safety of children.

1411 6.182. Further details on information sharing can be found in:

1412 • Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to  
1413 information sharing

1414 • Information Sharing: [Advice for Practitioners Providing Safeguarding Services to Children, Young  
1415 People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful

1416 • [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the  
1417 department

1418 • [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity,  
1419 including compliance with the GDPR.

1420 6.183. The following wording is to be added to any covering letter where we are sharing documentation:

1421 *"The material contained in this letter and its enclosures are confidential to Cambian Group and the persons  
1422 named within the documentation. The documentation is delivered only in accordance with a perceived  
1423 legal obligation to make the documentation available and upon the strict understanding that the recipient  
1424 and all members of the recipient's staff will undertake to preserve confidentiality and not in any way share  
1425 the documentation or any details of the information therein contained with any other party. Any person  
1426 receiving this information who breaches these obligations of confidentiality will be held strictly responsible  
1427 and will be expected to indemnify Cambian Group and any persons named within the documentation  
1428 against any losses that may arise as a result of misuse of this material".*

1429 6.184. If in doubt, the DSL or deputies must liaise with the company Caldicott Guardian. The contact details for  
1430 the Caldicott Guardian at our location is **Sarah Longley Cook** interim Clinical Director

1431 6.185. Failure to follow this policy and local procedure may result in disciplinary action.

## 1432 **Complaints and Monitoring**

1433 6.186. All complaints arising from the operation of this policy will be considered under the **0.22 complaints**  
1434 **procedure**, with reference to the our Designated Safeguarding Officer who is Ann Marie Edwards (DSL)  
1435 and East Riding Safeguarding Children's Board

## 1436 **7. Accountability**

1437 7.1. **Annmarie Edwards** is the DSL at Cambian Beverley School and has lead responsibility for protecting and  
1438 safeguarding children, young people and young adults and liaising with the local authority and other local



1439 agencies as appropriate. This includes young person protections, referrals, raising awareness, training,  
1440 allocating resources and supporting/directing staff within the Location. In all matters relating to young  
1441 person protection and safeguarding Beverley School will follow the procedures outlined in this policy.

1442 7.2. The content and effective implementation of policy and procedures are subject to routine monitoring by  
1443 the Head of Service. Our Managing/ Operations Director, Andrew Sutherland will undertake a full annual  
1444 review of the content and effective application of this policy and associated procedures. The date for the  
1445 next scheduled review is set out on page 2. The policy will be reviewed earlier in accordance with changes  
1446 in legislation, regulatory requirements or as a result of best practice guidance.

1447 7.3. Safeguarding at a strategic level is overseen by Amanda Sherlock - the Group Executive Director  
1448 Compliance, who will support and promote the development of initiatives to improve the prevention,  
1449 identification and response to abuse and neglect. As the Director accountable for safeguarding, she is  
1450 also responsible for reporting on safeguarding and providing executive leadership.

1451 7.4. Managers - are responsible for ensuring that staff are aware of this policy and offer support to those  
1452 reporting abuse. It is important to recognise that dealing with situations involving abuse and neglect can  
1453 be stressful and distressing for staff.

1454 7.5. Regulated professionals - Staff governed by professional regulation (for example, social workers, doctors,  
1455 allied health professionals and nurses) should understand how their professional standards and  
1456 requirements underpin their organisational roles to prevent, recognise and respond to abuse and neglect.

1457 7.6. All staff are responsible for identifying and responding to allegations of abuse. Staff at operational level  
1458 need to share a common view of what types of behaviour may be abuse or neglect and what should be  
1459 an initial response to suspicion or allegation of abuse or neglect.

1460 7.7. All staff **MUST** make sure that they have familiarised themselves with their local multi-agency  
1461 safeguarding policy as this policy is designed to complement rather than replace the multi-agency policies  
1462 which define the local practice that must be followed.

1463 7.8. In the event that the DSL or DSL Deputy are on leave or away from the Location and not contactable  
1464 alternative arrangements must be put in place, cascaded to staff and displayed so staff can access contact  
1465 names and details if required.

## 1466 8. Further Safeguarding information – what everyone need to know 1467 (Appendix 11)

1468 8.1. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours  
1469 linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual

1470 and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children  
1471 are at risk. Other safeguarding issues such as peer on peer (child on child) abuse

1472 8.2. All staff should be aware of are explored in the **Appendix 11. Further Safeguarding information – what**  
1473 **everyone need to know.**

## 1474 **9. Appendices**

### 1475 **Appendix 1: Relevant policies and documents**

- 1476 **1.** Child Protection and Safeguarding
- 1477 a) 25.01 - Index Form for Individuals Concern File
- 1478 b) 25.02 - Abuse Poster Individual
- 1479 c) 25.03 - Individual Safeguarding booklet – Easy Read
- 1480 d) 25.04 - Concern Form
- 1481 e) 25.05 - Safeguarding Tracking Pack
- 1482 f) 25.06 – Visitor Information Leaflet template
- 1483 g) 25.07 – Central Log of Concerns and Safeguarding – excel version
- 1484 h) 25.08 – Guidance to staff who had an allegation made against them
- 1485 i) 25.09 – Local Safeguarding procedure
- 1486 j) 25.10 – Staff Safeguarding Information poster
- 1487 k) 25.11 – Guidance notes for Designated or On call person
- 1488 l) 25.12 – Static body chart
- 1489 m) 25.13 – Weekly body chart
- 1490 n) 25.14 – Guidance for Investigating Unexplained Body Marks
- 1491 o) 25.15 – Guidance to Child Protection and Safeguarding at Cambian
- 1492 **2.** Whistleblowing
- 1493 **3.** Anti-bullying
- 1494 **4.** Child Sexual Exploitation
- 1495 **5.** Intimate and Invasive Care
- 1496 **6.** Self-harm and suicide
- 1497 **7.** Behaviour Support
- 1498 **8.** Physical Intervention
- 1499 **9.** Complaints Policy
- 1500 **10.** Health
- 1501 **11.** E –safety
- 1502 **12.** Capacity to consent



- 1503 **13.** Prevent
- 1504 **14.** Recruitment
- 1505 **15.** Code of Conduct
- 1506 **16.** Data Protection
- 1507 **17.** Confidentiality
- 1508 **18.** E- safety
- 1509 **19.** Disciplinary
- 1510 **20.** Complaints
- 1511 **21.** Code of Practice
- 1512 **22.** Mobile telephony
- 1513 **23.** SUI Caretech children's services process
- 1514 **24.** Caretech - Group Leaving Policy
- 1515 **25.** GHR 02 – Harassment and Bullying
- 1516 **26.** GHR 41 – Reference Requests
- 1517 **27.** GHR 41.1 DBS referral log

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## Appendix 2: Legislation and guidance

- 1543 • [The Children Act 2004, as amended by the Children and Social Work Act 2017](#)
- 1544 • [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](#)
- 1545
- 1546 • [Guide to the Young people's/care home Homes Regulations including the Quality Standards \(DfE: April 2015\)](#)
- 1547
- 1548 • This policy is also in accordance with the Local Safeguarding Young people Board (LSCP) locally agreed inter-agency safeguarding processes and procedures
- 1549
- 1550 • [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 \(July 2015\)](#)
- 1551
- 1552
- 1553 • [The Health and Social Care Act 2008 \(Regulated Activities\) Regulations 2015](#)
- 1554 • [Female Genital Mutilation Act 2003, \(as inserted by section 74 of the Serious Crime Act 2015\)](#)
- 1555 • [Terrorism Act 2000](#)
- 1556 • [Counter Terrorism and Security Act 2015](#)
- 1557 • [The School staffing regulations, England 2009](#)
- 1558 • [The Teachers Disciplinary regulations, 2012](#)
- 1559 • [Parts 3 and 4 Schedule to the Education independent Schools Standard Regulations, 2014.](#)
- 1560 • [All Wales Child Protection Procedures 2008](#)
- 1561 • [All Wales POVA Guidance 2008](#)
- 1562 • [Keep learners Safe 2015](#)
- 1563 • [The Care Act 2014](#)
- 1564 • [Social services and wellbeing Act 2014](#)
- 1565 • [Working Together to Safeguard Children 2018](#)
- 1566 • [Keeping children safe in Education 2021](#)
- 1567 • [Keeping children safe in education - part one 2021](#)
- 1568 • [Regulated activity in relation to children: scope](#)
- 1569 • [What to do if you're worried a child is being abused](#)
- 1570 • [Sexual violence and sexual harassment between children in schools and colleges 2021](#)
- 1571 • [Violence against women and girls](#)
- 1572 • <https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>
- 1573 • [Teaching online safety in school.pdf](#)

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

1587 DSL– DSL

CSC– Children’s Social Care

1588 CAF – Common Assessment framework

LADO – Local Authority Designated Officer

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STAFF

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DSL

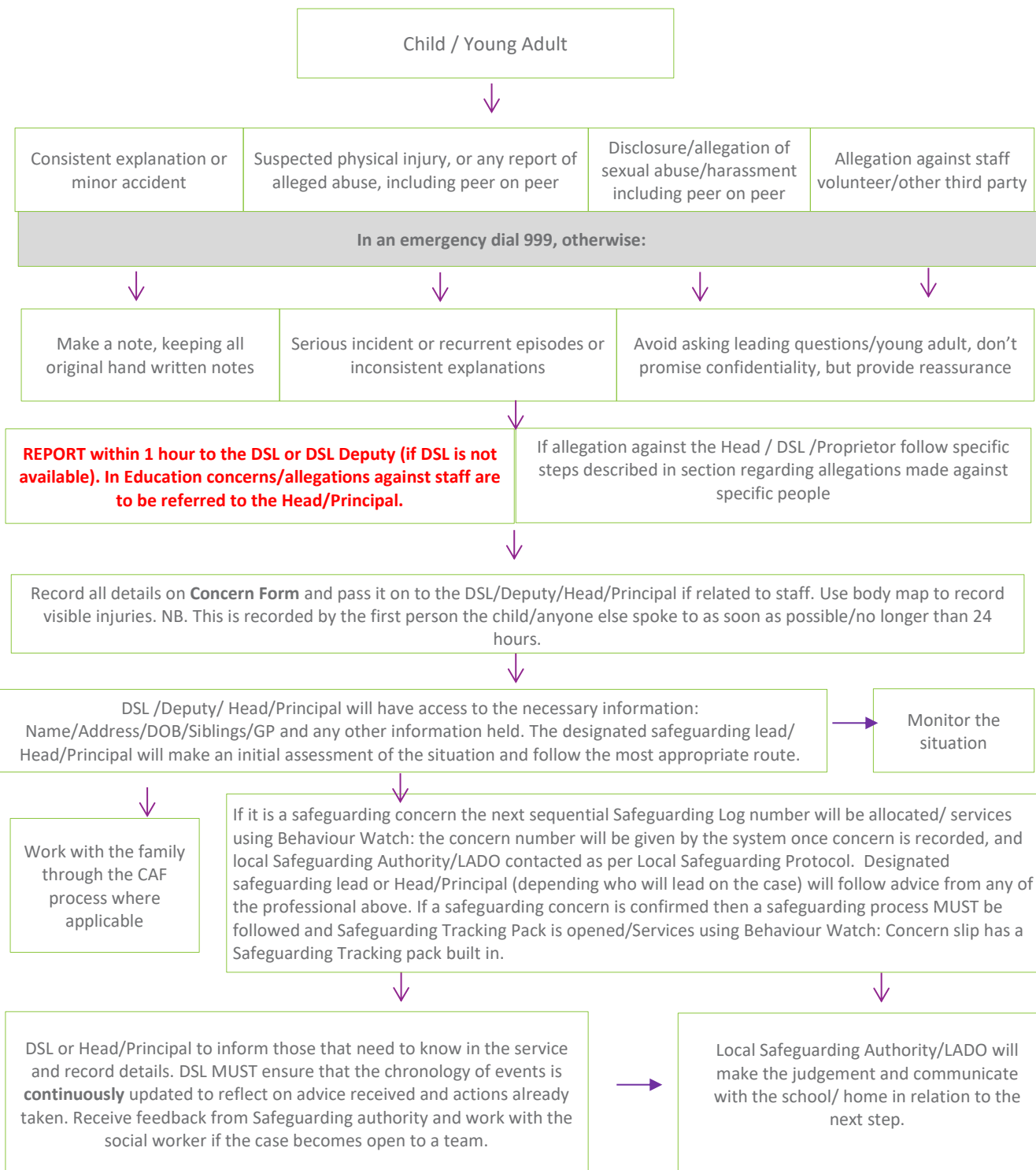
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1639 **Appendix 4: Types of abuse – children**

- 1640 • **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or  
1641 by failing to act to prevent harm. Children may be abused in a family or in an institutional or community  
1642 setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or  
1643 technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by  
1644 another child or children
- 1645 • **Physical abuse:** a form of abuse which may involve hitting, slapping, shaking, throwing, poisoning,  
1646 burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm  
1647 may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in  
1648 a child.
- 1649 • **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse  
1650 effects on the child's emotional development. It may involve conveying to a child that they are worthless  
1651 or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include  
1652 not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of  
1653 what they say or how they communicate. It may feature age or developmentally inappropriate  
1654 expectations being imposed on children. These may include interactions that are beyond a child's  
1655 developmental capability as well as overprotection and limitation of exploration and learning, or  
1656 preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-  
1657 treatment of another. It may involve serious bullying (including cyberbullying), causing children  
1658 frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of  
1659 emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 1660 • **Sexual abuse:** Sexual abuse may involve physical contact, including assault by penetration (for example  
1661 rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of  
1662 clothing. They may also include non-contact activities, such as involving children in the production of  
1663 sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children  
1664 to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the  
1665 internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual  
1666 abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding  
1667 issue (also known as peer on peer abuse) in education and all staff should be aware of it and of their  
1668 school or colleges policy and procedures for dealing with it,
- 1669 • **Child Sexual Exploitation and Child Criminal Exploitation** are forms of abuse that occur where an  
1670 individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child  
1671 into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or  
1672 for the financial advantage or increased status of the perpetrator or facilitator and/or through violence  
1673 or the threat of violence. CSE and CCE can affect children, both male and female and can include children  
1674 who have been moved (commonly referred to as trafficking) for the purpose of exploitation Child Sexual  
1675 Exploitation does not always involve physical contact; it can also occur through the use of technology.
- 1676 • **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result  
1677 in the serious impairment of the child's health or development. Neglect may occur during pregnancy as  
1678 a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:  
1679 provide adequate food, clothing and shelter (including exclusion from home or abandonment);  
1680 protect a child from physical and emotional harm or danger; ensure adequate supervision (including the  
1681 use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also  
1682 include neglect of, or unresponsiveness to, a child's basic emotional needs.
- 1683 • **Online abuse** - abuse that is facilitated using internet-connected technology. It may take place through  
1684 social media, online games or other channels of digital communication. Children can also be re-victimised  
1685 if evidence of their abuse is recorded or uploaded online. Technology can facilitate a number of illegal  
1686 abusive behaviours including, but not limited to: harassment; stalking; threatening behaviour; child  
1687 sexual abuse material; inciting a child to sexual activity; sexual exploitation; grooming; sexual  
1688 communication with a child; and, causing a child to view images or watch videos of a sexual act. Using  
1689 technology to facilitate any of the above activities is online abuse. Alongside those illegal activities that  
1690 are perpetrated online and constitute abuse, children may also be exposed to online harms, such as  
1691 inappropriate behaviours or content online. For instance, children may be bullied online by their peers  
1692 or they might, either accidentally or intentionally, view content which is intended for adults. Both online

1693 abuse and exposure to unsuitable content or behaviour can have a long-lasting impact on the wellbeing  
1694 of children and young people.

## 1695 Appendix 5: Types of abuse - adults

- 1696 • **Physical abuse** - assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing, rough handling,  
1697 scalding and burning, physical punishments, inappropriate or unlawful use of restraint, making someone  
1698 purposefully uncomfortable, involuntary isolation or confinement, misuse of medication, forcible feeding  
1699 or withholding food, unauthorized restraint, restricting movement.
- 1700 • **Honour based abuse** - encompasses Incidents/crimes which have been committed to protect/defend the  
1701 honour of the family and/or the community including female genital mutilation (FGM), forced marriage  
1702 and practices such as breast ironing. Abuse committed in the context of preserving “honour” often  
1703 involves a wider network of family or community pressure and can include multiple perpetrators. It is  
1704 important to be aware of this dynamic and additional risk factors when deciding what form of  
1705 safeguarding action to take. All forms of HBA are abuse (regardless if the motivation) and should be  
1706 handled and escalated as such. Professionals in all agencies, individuals and groups in relevant  
1707 communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered  
1708 HBA.
- 1709 • **Domestic violence or abuse** – this type of abuse can be characterised by any of the indicators of abuse  
1710 outlined in this briefing relating to: psychological, physical, sexual financial, emotional. Domestic violence  
1711 and abuse includes any incident or pattern of incidents of controlling, coercive or threatening behaviour,  
1712 violence or abuse between those aged 16 or over who are or have been, intimate partners or family  
1713 members regardless of gender or sexuality.
- 1714 • **Sexual abuse** - Rape, attempted rape or sexual assault, inappropriate touch anywhere, non- consensual  
1715 masturbation of either or both persons, non- consensual sexual penetration or attempted penetration of  
1716 the vagina, anus or mouth, any sexual activity that the person lacks the capacity to consent to,  
1717 inappropriate looking, sexual teasing or innuendo or sexual harassment, sexual photography or forced  
1718 use of pornography or witnessing of sexual acts, Indecent exposure.
- 1719 • **Sexual harassment**- unwanted conducts of a sexual nature that can occur online and offline, sexual  
1720 harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or  
1721 humiliated, and/or create a hostile, offensive or sexualised environment.
- 1722 • **Psychological or emotional abuse** - Enforced social isolation and/or preventing someone accessing  
1723 services, educational and social opportunities and seeing friends, removing mobility or communication  
1724 aids or intentionally leaving someone unattended when they need assistance, preventing someone from  
1725 meeting their religious and cultural needs, preventing the expression of choice and opinion, failure to  
1726 respect privacy, preventing stimulation, meaningful occupation or activities, intimidation, coercion,  
1727 harassment, use of threats, humiliation, bullying, swearing or verbal abuse, addressing a person in a  
1728 patronising or infantilising way, threats of harm or abandonment, cyber bullying.
- 1729 • **Financial or material abuse** - Theft of money or possessions, scamming, preventing a person from  
1730 accessing their own money, benefits or assets, employees taking a loan from a person using the service,  
1731 undue pressure, duress, threat or undue influence put on the person in connection with loans, wills,  
1732 property, inheritance or financial transactions, arranging less care than is needed to save money to  
1733 maximise inheritance, denying assistance to manage/monitor financial affairs, denying assistance to  
1734 access benefits, misuse of personal allowance in a care home, misuse of benefits or direct payments in  
1735 a family home, someone moving into a person’s home and living rent free without agreement or under  
1736 duress, false representation, using another person's bank account, cards or documents, exploitation of a  
1737 person’s money or assets, e.g. unauthorised use of a car, misuse of a power of attorney, deputy,  
1738 appointeeship or other legal authority.
- 1739 • **Modern slavery** – Human trafficking, forced labour, domestic servitude, sexual exploitation, such as  
1740 escort work, prostitution and pornography, debt bondage – being forced to work to pay off debts that  
1741 realistically they never will be able to.
- 1742 • **Discriminatory abuse** - Unequal treatment based on age, disability, gender reassignment, marriage and  
1743 civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as  
1744 ‘protected characteristics’ under the Equality Act 2010). Verbal abuse, derogatory remarks or  
1745 inappropriate use of language related to a protected characteristic, denying access to communication  
1746 aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion on  
1747 the grounds of a protected characteristic, denying basic rights to healthcare, education, employment and

- 1748 criminal justice relating to a protected characteristic, substandard service provision relating to a  
1749 protected characteristic.
- 1750 • **Organisational or institutional abuse** - Discouraging visits or the involvement of relatives or friends, run-  
1751 down or overcrowded establishment, authoritarian management or rigid regime, lack of leadership and  
1752 supervision, insufficient staff or high turnover resulting in poor quality care, abusive and disrespectful  
1753 attitudes towards people using the service, inappropriate use of restraints, lack of respect for dignity and  
1754 privacy, failure to manage residents with abusive behaviour, not providing adequate food and drink, or  
1755 assistance with eating, not offering choice or promoting independence, misuse of medication, failure to  
1756 provide care with dentures, spectacles or hearing aids, not taking account of individuals' cultural, religious  
1757 or ethnic needs, failure to respond to abuse appropriately, interference with personal correspondence  
1758 or communication, failure to respond to complaints.
  - 1759 • **Neglect or acts of omission** - Failure to provide or allow access to food, shelter, clothing, heating,  
1760 stimulation and activity, personal or medical care, providing care in a way that the person dislikes, failure  
1761 to administer medication as prescribed, refusal of access to visitors, not taking account of individuals'  
1762 cultural, religious or ethnic needs, not taking account of educational, social and recreational needs,  
1763 ignoring or isolating the person, preventing the person from making their own decisions, preventing  
1764 access to glasses, hearing aids, dentures, etc., failure to ensure privacy and dignity.
  - 1765 • **Self-neglect** -The Care Act 2014 statutory guidance for adults includes self-neglect in the categories of  
1766 abuse or neglect relevant to safeguarding adults with care and support needs. In some circumstances,  
1767 where there is a serious risk to the health and wellbeing of an individual, it may be appropriate to raise  
1768 self-neglect as a safeguarding concern. However, interventions for self-neglect are usually more  
1769 appropriate under the parts of the Care Act dealing with assessment, planning, information and advice,  
1770 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



1837 Unsuitable clothing or not enough clothes

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1839 **Domestic abuse**

1840 • Becoming anxious or depressed

1841 • Having difficulty sleeping

1842 • Complaining of physical symptoms such as tummy aches

1843 • Starting to wet their bed

1844 • Behaving as though they are much younger than they are

1845 • Having problems with school

1846 • Becoming aggressive or they may internalise their distress and withdraw from other people

1847 • Having a lowered sense of self-worth

1848 • Older children may begin to play truant or start to use alcohol or drugs

1849 • They beginning to self-harm by taking overdoses or cutting themselves

1850

1851 **Peer on Peer abuse**

1852 • Absence from school or disengagement from school activities

1853 • Physical injuries

1854 • Mental or emotional health issues

1855 • Becoming withdrawn – lack of self esteem

1856 • Lack of sleep

1857 • Alcohol or substance misuse

1858 • Changes in behavior

1859 • Inappropriate behavior doe age

1860 • 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.

1938

1939 **Appendix 8: DSL/DSL Deputy, Head/Principal (if the concern/allegation is related to staff) – actions, reporting**  
1940 **and recording procedure**

1941 • Staff notifies the DSL /Head/Principal of their concern as soon as it is possible but no later than within 1  
1942 hour from the moment of disclosure/report from the child/young person/other person, completes and  
1943 passes the Concern form as soon as it is possible, but no later than 24hrs from the moment of  
1944 disclosure/report. If the DSL is unavailable, passes it on to the DSL Deputy. In Education, if the concern is  
1945 related to the staff and the Head/Principal is not available, staff must report their concern to the DSL  
1946 instead, so there is no delay in reporting of the concern. The DSL will then liaise with the Head/Principal  
1947 to agree on the next step. Services using Behaviour Watch: staff must report their concern verbally before  
1948 completing the Concern/Safeguarding slip in the system.

1949 • DSL/DSL Deputy or Head/Principal (depending on who will lead on the case) enters the concern details  
1950 on the **25.07. Central Log of Concerns and Safeguarding** and inserts the concern reference number on  
1951 the Concern Form. Services using Behaviour Watch – DSL/DSL Deputy or Head/Principal reviews the  
1952 concern and decides on the next step which may lead to Safeguarding Tracking Pack being opened  
1953 (Safeguarding Tracking Pack is built as part of the concern slip should the case proceed to safeguarding).

1954 • If it is deemed to be a child protection/safeguarding (children and adults) matter the DSL/DSL Deputy or  
1955 Head/Principal will then also additionally allocate the next sequential Safeguarding Reference number on  
1956 the **25.07. Central Log of Concerns and Safeguarding**, write this number on the Concern form and  
1957 immediately (or at least within one hour of receiving the concern form, make a referral to the East Riding  
1958 safeguarding board and the Local Authority Designated Officer (LADO) where required, to discuss the  
1959 allegation and agree a course of action. DSL/DSL Deputy or Head/Principal using the Behaviour Watch  
1960 system will progress to the next stage – Safeguarding part of the concern/SG slip which is only accessible  
1961 to the Safeguarding Team.

1962 • If the Local Safeguarding Authority/LADO confirms that they do not consider the matter to be a  
1963 safeguarding concern, then the date and time of the contact is recorded on the Concern Form and on the  
1964 Central Log of Concerns and Safeguarding and it is marked as a Safeguarding Level 1 – Initial Informal  
1965 Investigation. The Head of Service/Head/Principal/DSL/DLS Deputy MUST ensure that a member of their  
1966 Senior Management Team is assigned to look into the concern. The review must be recorded and  
1967 outcomes shared with the people involved. Feedback from the review session MUST be provided to local  
1968 Safeguarding Authority/LADO. Services using the Behaviour Watch system will follow the same set of  
1969 steps apart from populating the Central Log of Concerns and Safeguarding as the log can be generated  
1970 by the system using chosen filtering criteria.

1971 • It is important to allocate a Safeguarding reference on the log even if no further action needs to be taken.  
1972 This diligent approach will ensure a clear historic record of contact with Local Safeguarding  
1973 Authority/LADO for any matter which is deemed by the DSL to be of concern and has been raised with  
1974 the Local Safeguarding Authority/LADO whichever appropriate.

1975 • If the Local Safeguarding Authority/LADO confirms that the matter is a safeguarding concern and that it  
1976 requires investigation either at internal or external level then a **25.05 Safeguarding Tracking pack** must  
1977 be opened with the next sequential Safeguarding Reference included on the form and details as such  
1978 entered on the central log.

1979 • Services using the Behaviour Watch system – where a concern progresses to Safeguarding Tracking Pack  
1980 being opened, a one record will be created including the original concern, with the whole document  
1981 having the same slip number.

1982 • Copy of **25.05 Safeguarding Tracking Pack** (initially with completed sec. 1-5) should be submitted to the  
1983 **Responsible/Nominated Individual and** in day schools - **Regional Education Manager** as a follow up to  
1984 the initial reporting telephone contact. STP must be sent again to **Responsible/Nominated Individual**  
1985 **and Regional Education Manager** on completion, providing detailed overview of the actions taken and  
1986 the final outcome. Services using the Behaviour Watch will be able to trigger live notification to the  
1987 Regional Manager (Education/Care), Responsible/Nominated Individual and Registered Manager – where  
1988 appropriate. The **Responsible/Nominated Individual and Regional Education Manager** in day schools

1989 1990	will update relevant Directors. This original form will be saved in the Safeguarding file/Behaviour Watch – Concern/SG module.
1991 1992 1993	• In the case of serious harm, and/or the child/young person or young adult is in immediate danger the local Police should be informed immediately as well and they can take immediate protective action as necessary.
1994 1995 1996 1997 1998	• If the matter is a more general concern then ensure that the ‘Action Taken’ log on the concern form is completed and the form is filed within the Safeguarding file. Either way the form must be signed by the DSL/DSL Deputy or Head/Principal. Services using the Behaviour Watch system can use Concern/Safeguarding ‘Other’ slip to record concerns which are not related to children/young people, staff or children/young people and staff.
1999 2000 2001 2002	• The relevant concern form should be referenced in the Individual’s <b>25.01 Index form for Individual concern/safeguarding file</b> and the site’s <b>25.07 Central Log of Concerns and Safeguarding</b> . Services using Behaviour Watch will be able to filter information per chosen criteria and also generate reports per each child/young person in the school, college, children’s or care homes.
2003 2004	• All information relating to the Safeguarding concern is recorded on the <b>25.05 Safeguarding Tracking Pack /Behaviour Watch Concern/SG module</b> .
2005 2006 2007 2008 2009 2010	• The Safeguarding Concern will remain open until Local Safeguarding Authority/LADO have confirmed in writing that the concern is closed and Responsible/Nominated Individual and Regional Education Manager in day schools has signed the Safeguarding tracking pack to confirm that the investigation is completed in full and can be closed. <b><u>The Safeguarding will remain open until both elements of sign-off have been completed.</u></b> Once the Safeguarding tracking Pack is signed, it <b>MUST</b> be filed in the Safeguarding file.
2011 2012 2013	• If it is believed that the Individual is in imminent danger urgent advice should be sought from the Local Authority and/or the police. The individual can be kept in their care home or on the school/college site fully supported (e.g. if they are a day student) if advised to do so.
2014 2015	• The parent/carers should be informed and a decision should be made with the Local Authority and the Police about what action is to be taken and whom by.
2016 2017 2018 2019 2020	• If the DSL/DSL Deputy or Head/Principal is unsure about what the Individual has said or what has been said by others they can phone the Local Authority to discuss concerns. To do so would not constitute an abuse referral but may help to clarify the situation but they must record all details of any conversation and advice received on a concern form. He/she can then move to a formal referral or actively monitor the situation.
2021 2022 2023 2024	• The Local Safeguarding Authority/LADO will oversee any subsequent investigation of any suspicion or allegation of abuse directed against anyone working within the establishment. The establishment <b>MUST</b> not internally investigate any allegations of abuse without first taking instruction from the local Safeguarding Authority/LADO.
2025 2026	• Once agreed by Local Safeguarding Authority/LADO that the provider can commence the internal management investigation (level 2), the investigation process will commence.
2027 2028 2029	• Once agreed by Local Safeguarding Authority/LADO that the investigation will be completed by the external agency (level 3), Head of Service/Head/Principal /DSL/DSL Deputy will take appropriate steps to assist the external agency to ensure the investigation is completed without a delay.
2030 2031 2032	• Registered Manager <b>MUST</b> notify relevant regulator by submitting specific statutory notification within the time frame specified by their regulator. This is regardless of who leads on the investigation and whether or not the investigation has been concluded.
2033 2034 2035	• If as the result of an investigation there has been a substantiated allegation against a member of staff, we will work with the Local Safeguarding Authority/LADO to determine whether there are any improvements to be made to our safeguarding policy, procedures and practice to prevent similar events

2036 in the future. Also we will work with our internal Human Resources department and may commence  
2037 proceedings under **GHR 27. Disciplinary policy and procedure.**

- 2038 • We will co-operate entirely with any investigation carried out by the Local Authority and/or the Police.  
2039 Records are kept of all conversations as part of the investigation process and made available as  
2040 required.

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## Appendix 9: Key contacts

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**DSL** Ann Marie Edwards

2079

**Telephone (24hrs)** 078255319128

Email: [Annmarie.Edwards@cambiangroup.com](mailto:Annmarie.Edwards@cambiangroup.com)

2081

2082

**DSL Deputy** Adele Bell

2084

**Telephone (24hrs)** 07904747610

Email: [Adele.Bell@cambiangroup.com](mailto:Adele.Bell@cambiangroup.com)

2086

2087

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

2089

**Telephone (24hrs)** 078255319128

Email: [Annmarie.Edwards@cambiangroup.com](mailto:Annmarie.Edwards@cambiangroup.com)

2091

2092

**Headteacher** Ann Marie Edwards

Email: [Annmarie.Edwards@cambiangroup.com](mailto:Annmarie.Edwards@cambiangroup.com)

2094

2095

**Telephone (24hrs)** 078255319128

2097

**Home Manager** Symone Hodson

Email: [Symone.Hodson@cambiangroup.com](mailto:Symone.Hodson@cambiangroup.com)

2099

2100

**Telephone (24hrs)** 01482 492636

2102

**Operations Director** Andrew Sutherland

2104

**Telephone (24hrs)** 07701314378

Email: [Andrew.Sutherland@cambiangroup.com](mailto:Andrew.Sutherland@cambiangroup.com)

2106

2107

**Managing Director** is Lorna Fearon

2109

**Telephone (24hrs)** 07896560696

Email: [Lorna.Fearon@cambiangroup.com](mailto:Lorna.Fearon@cambiangroup.com)

2111

2112

**Group Executive Director – Children’s Services** is Jeremy Wiles

2114

**Telephone:** 079190232207

Email: [Jeremy.Wiles@caretech-uk.com](mailto:Jeremy.Wiles@caretech-uk.com)

2116

2117

**Organisation’s Strategic Safeguarding Lead** is Amanda Sherlock - Group Executive Director - Compliance

2119

**Telephone:** 01707 601 800

Email: [Amanda.Sherlock@caretech-uk.com](mailto:Amanda.Sherlock@caretech-uk.com)

2121

2122

**Representative, Proprietor - Caretech Education Services** is Andrew Sutherland – MD of Education Services

2124

**Telephone:** 07701314378

Email: [Andrew.Sutherland@caretech-uk.com](mailto:Andrew.Sutherland@caretech-uk.com)

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**Local Authority.**

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**East Riding Local Authority & East Riding Safeguarding Children’s Board**

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**East Riding Local Authority & East Riding Safeguarding Adults’ Board**

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Telephone 01482 395500

2135

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

2137

Outside of office hours 01482 393939

2139

Police: 01482 630127

2141

The non-emergency police telephone number is: 101.

2143

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

2145

The Local Authority Designated Officer (LADO) is Siobhan Bath

2147

Telephone (Office hours: 01482 392139 Outside of office hours/weekends, the emergency duty team can be contacted

2149: **01609 533080**

2150

**East Riding safeguarding board**

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

2153

**Address:**

2155 RSCP

2157 **Lairgate**

2159 **Beverley**

2161 **U17 OJT**

2159

Telephone (24hrs): 01377 241273

Email: [childrens.socialcare@eastriding.gcsx.gov.uk](mailto:childrens.socialcare@eastriding.gcsx.gov.uk)

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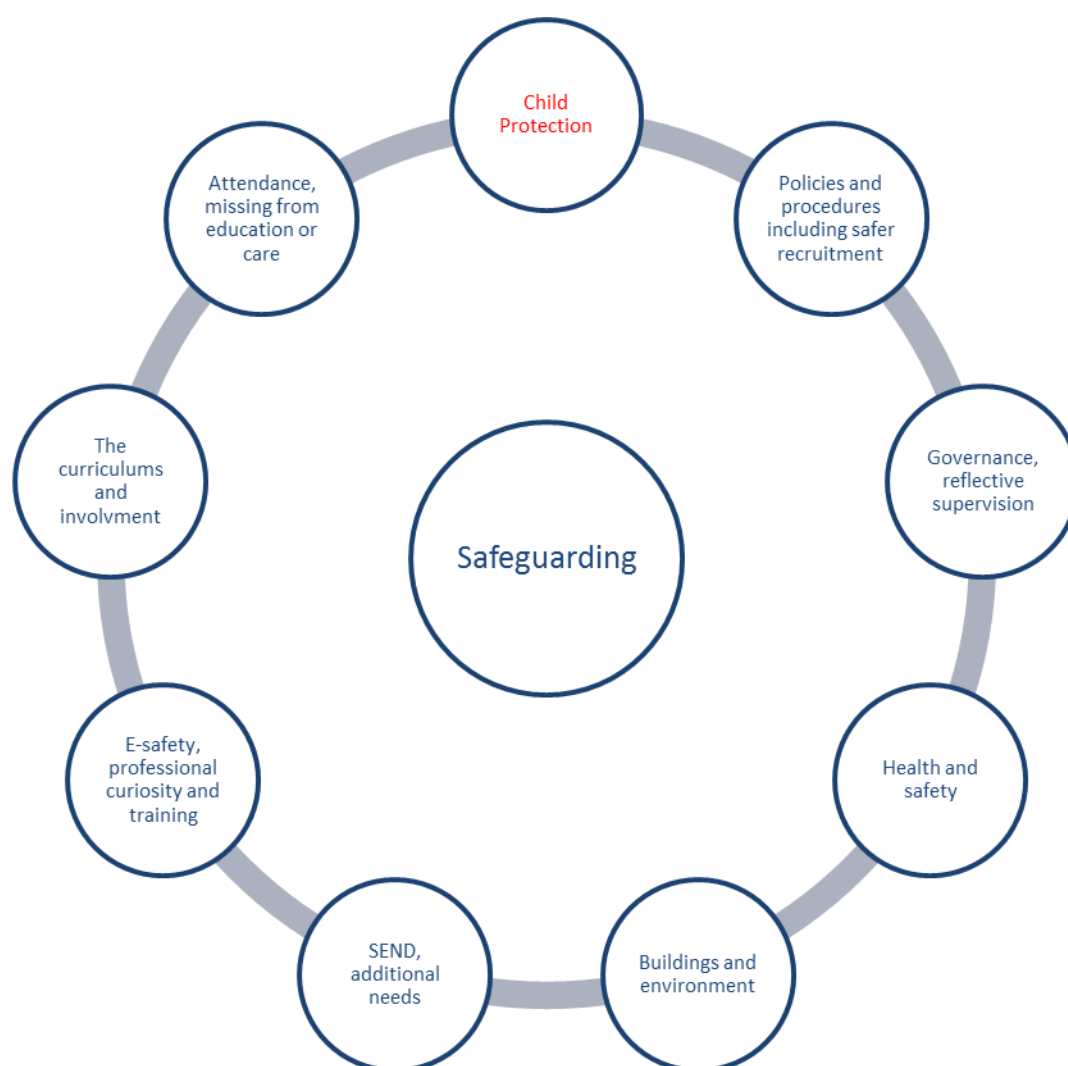
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## Appendix 10. Safeguarding in children's Services - illustration



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

### 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

2205 objectives of child protection systems in recognition that young people are vulnerable to abuse in a range  
2206 of social contexts’.

2207 9.2. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors  
2208 outside the school or college and/or can occur between children outside of these environments. All staff,  
2209 but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation  
2210 in situations outside their families. Extra-familial harms take a variety of different forms and children can  
2211 be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation,  
2212 and serious youth violence (KCSiE2021). Further advice for schools and colleges is provided in the [Home](#)  
2213 [Office’s Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and](#)  
2214 [vulnerable adults: county lines guidance](#)

2215 9.3. Children’s social care assessments should consider where children are being harmed in contexts outside  
2216 the home (family home, children’s/care home), so it is important that schools, colleges and  
2217 children’s/care homes provide as much information as possible as part of the referral process. This will  
2218 allow any assessment to consider all the available evidence and enable a contextual approach to address  
2219 such harm. More information about Contextual safeguarding can be found on [NSPCC website](#).

2220 9.4. We will consider the various factors that have an interplay with the life of any child/young person about  
2221 whom we have concerns within the setting and the level of influence that these factors have on their  
2222 ability to be protected and remain free from harm particularly when it comes to child exploitation or  
2223 criminal activity.

2224 9.5. Whilst this term applies to this specific definition, the notion of considering a child/young person within  
2225 a specific context is also important. What life is like for e.g. day/part time/38 weeks student outside the  
2226 school, college, children’s/care home gates, within their family home when they visit (children attending  
2227 residential education), within the family (day students) and within the community (extracurricular off site  
2228 activities, events, groups and clubs) are key considerations when the DSL is looking at any concerns.

## 2229 **Bullying**

2230 9.6. Our approach to bullying is set out in a separate **0.21. Anti – bullying policy and procedure** acknowledges  
2231 that to allow or condone bullying may lead to consideration under child protection procedures. Bullying  
2232 is a safeguarding matter that if left unresolved can become a child protection matter. Our settings take  
2233 seriously any bullying concerns and both investigate and take action to protect Individuals where  
2234 appropriate.

## 2235 **Peer on peer (child on child) abuse**

2236 9.7. Boarding schools, residential special schools, residential colleges and children’s homes and care homes  
2237 for young adults attending education (FE colleges) have additional factors to consider with regard to  
2238 safeguarding. Schools and colleges that provide such residential accommodation and/or are registered  
2239 as children’s homes should be alert to signs of abuse in such settings (for example, inappropriate pupil or  
2240 student relationships and the potential for peer on peer abuse, particularly in schools and colleges where  
2241 there are significantly more girls than boys or vice versa) and work closely with the host local authority  
2242 and, where relevant, any local authorities that have placed their children there. All residential setting  
2243 within the Organisation children’s service will continuously maintain their communication with the  
2244 internal and external Education providers to ensure the additional factors are being considered and any  
2245 concerns shared in a timely manner and with the right people.

2246 9.8. All staff should be aware that children can abuse other children (often referred to as peer on peer abuse)  
2247 and that it can happen both inside and outside of school/college/children’s/care home and online. It is  
2248 important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify  
2249 it and respond to reports. In some schools, colleges, children’s / care homes site – based or regional  
2250 members of therapy teams might need to be involved and support the SLT to identify the most effective

2251 ways of communication with the child/young person who may have potentially been the victim of Peer  
2252 on Peer abuse and who instigated it.

2253 9.9. It must be recognised that children and young people would require varied approaches and  
2254 communication mechanisms to be present and available so they can report abuse. Children must be  
2255 regularly reassured that their concern/reports will be treated seriously every time they report it.

2256 9.10. Children needs to be told what will happen from the moment their concern is shared, so the lack of  
2257 knowledge of what may happen next will not prevent them from sharing their concern/s in the future.  
2258 Children need to know that that their concerns will be investigated and dealt with. Child's/young person's  
2259 preference in terms of how feedback should be provided must be taken into consideration so this can be  
2260 planed for in advance.

2261 9.11. The communication with each child throughout the process of Peer on peer abuse investigation must be  
2262 regular, proportionate and take place using suitable communication.

2263 9.12. In [Ofsted review of sexual abuse in schools and colleges](#), young people stated that some of them didn't  
2264 receive timely and appropriate support from the school/college, hence the communication and support  
2265 must become one of the critical points of a significant priority to those responding to and those managing  
2266 peer on peer abuse cases including those of a sexual nature. Other consideration for all providers were:

- 2267 • To assume it is happening here and plan accordingly
- 2268 • Work on and strengthen the whole school, college, children's/care home approach to  
2269 developing a safeguarding culture
- 2270 • To ensure staff model respectful behaviour
- 2271 • To ensure children and young people are clear about acceptable and unacceptable behaviour
- 2272 • To ensure children/young people are confident to ask for help
- 2273 • To ensure carefully planned and implemented RSHE curriculum
- 2274 • To ensure the behavioural approach with sanctions & interventions for poor behaviour
- 2275 • To have mechanisms to support students who need it in the way they need it
- 2276 • To ensure staff have access to suitable training & that there are clear expectation for staff and  
2277 Managers
- 2278 • To ensure pupil's voice in heard and responded to
- 2279 • To ensure DSLs have some protected time to engage with local safeguarding partners and  
2280 LADOs, so those relationships can be strengthened
- 2281 • To ensure staff follow the guidance in Keeping Children Safe in Education
- 2282

2283 9.13. All staff should understand, that even if there are no reports in their schools or colleges it does not mean  
2284 it is not happening, it may be the case that it is just not being reported. As such it is important if staff  
2285 have any concerns regarding peer on peer abuse they should speak to their DSL (or deputy).

2286 9.14. The Organisation has zero - tolerance approach to any type of abuse including sexual violence and  
2287 harassment. Staff must NOT take the view that it doesn't not happen in their setting. It is essential that  
2288 all staff understand the importance of challenging inappropriate behaviours between peers, many of  
2289 which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example  
2290 dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being  
2291 boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst

2292 case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming  
2293 forward to report it.

2294 9.15. The Organisation recognises that it is more likely that girls will be victims and boys' perpetrators, but that  
2295 all peer on peer abuse is unacceptable and will be taken seriously. It is essential that all victims are  
2296 reassured that they are being taken seriously and that they will be supported and kept safe.

2297 9.16. Peer on peer abuse is most likely to include, but may not be limited to:

2298

- 2299 • Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- 2300 • Abuse in intimate personal relationships between peers
- 2301 • Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- 2302 (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- 2303 • Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online
- 2304 element which facilitates, threatens and/or encourages sexual violence). For further information about
- 2305 sexual violence see [Annex B.](#)
- 2306 • Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may
- 2307 be standalone or part of a broader pattern of abuse; For further information about sexual harassment
- 2308 see [Annex B.](#)
- 2309 • Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch
- 2310 themselves sexually, or to engage in sexual activity with a third party
- 2311 • Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as
- 2312 sexting or youth produced sexual imagery). For more information about this read UKCIS guidance:
- 2313 [Sharing nudes and semi-nudes advice for education settings.](#)
- 2314 • Upskirting ( For further information about upskirting see Annex B) which typically involves taking a
- 2315 picture under a person's clothing without their permission, with the intention of viewing their genitals
- 2316 or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and

2317 9.17. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or  
2318 humiliation used as a way of initiating a person into a group and may also include an online element)

2319 9.18. Staff must be clear as to the school/college's/home's procedures with regards to peer on peer abuse and  
2320 the important role they have to play in preventing it and responding where they believe a child may be  
2321 at risk from it.

2322 9.19. All Individuals will be provided with safeguarding information in a format which is appropriate for their  
2323 understanding and communication. This may take the form of posters or a leaflet/booklet.

2324 9.20. All contact behaviours that have a sexual nature to them such as pushing or rubbing against, grabbing  
2325 bottoms, breasts or genitals, pinching or flicking bras, lifting skirts or pulling down trousers will be  
2326 challenged by staff and appropriate levels of action, which may include disciplinary action will be taken.  
2327 This is to ensure children/young people and staff are clear that these behaviours will not be tolerated or  
2328 acceptable. However, it is critical to state that some children with cognitive impairment may not be able  
2329 to fully understand how children on the receiving end of such behaviour may feel, therefore staff will  
2330 work with each of the children affected by the situation in order to enhance their understanding of the  
2331 seriousness of their behaviour, so any behaviour of such nature in the future can be prevented.

2332 **Serious violence**

2333

2334 9.21. All staff should be aware of the indicators, which may signal children are at risk from, or are involved with  
2335 serious violent crime. These may include increased absence from school, a change in friendships or  
2336 relationships with older individuals or groups, a significant decline in performance, signs of self-harm or  
2337 a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new

- 2338 possessions could also indicate that children have been approached by, or are involved with, individuals  
2339 associated with criminal networks or gangs and may be at risk of criminal exploitation.
- 2340 9.22. All staff should be aware of the range of risk factors which increase the likelihood of involvement in  
2341 serious violence, such as being male, having been frequently absent or permanently excluded from  
2342 school, having experienced child maltreatment and having been involved in offending, such as theft or  
2343 robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and  
2344 gang involvement and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).
- 2345 9.23. Sexual violence and sexual harassment between children can occur between two children of **any age and**  
2346 **sex from primary to secondary stage and into colleges. It can also occur online.** It can also occur through  
2347 a group of children sexually assaulting or sexually harassing a single child or group of children.
- 2348 9.24. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful  
2349 and distressing. This will, in all likelihood, adversely affect their educational attainment and will be  
2350 exacerbated if the alleged perpetrator(s) attends the same school or college or lives in the same  
2351 children's/care home. Sexual violence and sexual harassment exist on a continuum and may overlap, they  
2352 can occur online and face to face (both physically and verbally) and are never acceptable. All staff working  
2353 with children are advised to maintain an attitude of 'it could happen here'.
- 2354 9.25. It is essential that all victims are reassured that they are being taken seriously and that they will be  
2355 supported and kept safe. **A victim should never be given the impression that they are creating a problem**  
2356 **by reporting sexual violence or sexual harassment.** Nor should a victim ever be made to feel ashamed  
2357 for making a report.
- 2358 9.26. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that  
2359 victims are protected, offered appropriate support and every effort is made to ensure their education is  
2360 not disrupted. It is also important that other children, adult students and school and college staff are  
2361 supported and protected as appropriate.
- 2362 9.27. There is support available for schools and colleges. Paragraph 52 and Annex A in the [Sexual Violence](#)  
2363 [and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed information  
2364 and links to resources.
- 2365 9.28. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with  
2366 special educational needs and disabilities (SEND) and LGBT children are at greater risk.
- 2367 9.29. Staff should be aware of the importance of:
- 2368 • Challenging inappropriate behaviours;
  - 2369 • Making clear that sexual violence and sexual harassment is not acceptable, will never be  
2370 tolerated and is not an inevitable part of growing up;
  - 2371 • Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing  
2372 up", "just having a laugh" or "boys being boys"; and
  - 2373 • Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms,  
2374 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or  
2375 tolerating such behaviours risks normalising them.
- 2376 9.30. Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to  
2377 inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is  
2378 developmentally inappropriate and may cause developmental damage. An umbrella term for these types  
2379 of behaviour are often referred to as **"harmful sexual behaviour"**. The term has been widely adopted in  
2380 child protection. Harmful sexual behaviour can occur online and/or offline and can also occur  
2381 simultaneously between the two. Harmful sexual behaviour should be considered in a child protection  
2382 context.
- 2383 9.31. Situations where children/young people are forced or coerced into sexual activity by peers or associates  
2384 can be related with gang / serious youth violence activity but that is not always the case. Peer influence

2385 or peer pressure is a major factor in the decisions made by young people to join particular groups. Many  
2386 young people see it as a “way out” from their day to day life and feel a strong bond with their peers, one  
2387 which they may be lacking at home. Examples of peer-on-peer abuse including sexualised online bullying  
2388 include:

2389 • **Racist and Religious Bullying** - a range of hurtful behaviour, both physical and psychological, that  
2390 makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their  
2391 colour, ethnicity, culture, faith community, national origin or national status.

2392 • **Sexual, Sexist Bullying** - any behaviour, whether physical or non-physical, where sexuality or gender  
2393 is used as a weapon by boys or girls, this may also include any of the following:

- 2394 - Spreading rumors about someone's alleged sex life
- 2395 - Using offensive terms to describe a person
- 2396 - Inappropriate touching or attempts to do so
- 2397 - Non-consensual sharing of sexual images and videos
- 2398 - Unwanted sexual comments and messages, including those on social media
- 2399 - Any sexual exploitation, coercion and threats
- 2400 - Sexual assault and rape

2401 • **Upskirting** - taking a picture under a person’s clothing without their permission and /or knowledge,  
2402 with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual  
2403 gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any  
2404 gender, can be a victim The Voyeurism Offences Act, which was commonly known as the Upskirting  
2405 Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.

2406 • **Transphobic bullying** - is based on fear, hatred, disbelief, or mistrust of people who are transgender,  
2407 thought to be transgender, or whose gender expression doesn’t conform to traditional gender roles.  
2408 Transphobia can prevent transgender and gender nonconforming people from living full lives free  
2409 from harm.

2410 • **Homophobic Bullying** - targets someone because of their sexual orientation (or perceived sexual  
2411 orientation);

2412 • **Disablist Bullying** - targets a young person solely based on their disability. This can include  
2413 manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a  
2414 certain aspect of the victim’s disability.

2415 • **Prejudice based and discriminatory bullying** - Prejudice is an unjustified or incorrect attitude (usually  
2416 negative) towards an individual based solely on the individual's membership of a social group. For  
2417 example, a person may hold prejudiced views towards a certain race or gender etc. (e.g.



2418 sexist). **Discrimination** is the behavior or actions, usually negative, towards an individual or group of  
2419 people, especially on the basis of sex/race/social class.

2420 9.32. Definitions related to sexual violence and sexual harassment can be accessed via [KCSIE2021/Annex B](#)  
2421 (pages 139 – 140) and more details about how to respond have been included in [KCSIE 2021 Part 5. Child](#)  
2422 [on child sexual violence and sexual harassment](#).

#### 2423 **What staff should do if they have concerns about the child/young person**

2424 9.33. Staff working with children/young people are advised to maintain an attitude of ‘it could happen here’  
2425 where safeguarding is concerned. When concerned about the welfare of a child/young person, staff  
2426 should always act in the best interests of the child/young person

2427 9.34. If staff have any concerns about a child’s/young person welfare, they should act on them immediately by  
2428 following this procedure and reporting their concern to the DSL/DSL Deputy.

#### 2429 **Opportunities to teach safeguarding**

2430 9.35. Governing bodies and proprietors should ensure that, as part of the requirement for staff to undergo  
2431 regular updated safeguarding training, including online safety and the requirement to ensure children  
2432 are taught about safeguarding, including online safety, that safeguarding training for staff, including  
2433 online safety training, is integrated, aligned and considered as part of the whole school or college  
2434 safeguarding approach and wider staff training and curriculum planning.

2435 9.36. Whilst considering the above training requirements, governing bodies and proprietors should have  
2436 regard to the [Teachers’ Standards](#) which set out the expectation that all teachers manage behaviour  
2437 effectively to ensure a good and safe educational environment and requires teachers to have a clear  
2438 understanding of the needs of all pupils.

2439 9.37. Governing bodies and proprietors should ensure that children are taught about safeguarding, including  
2440 online safety, and recognise that a one size fits all approach may not be appropriate for all children, and  
2441 a more personalised or contextualised approach for more vulnerable children, victims of abuse and some  
2442 SEND children might be needed.

2443 9.38. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may  
2444 cover relevant issues through tutorials). This may include covering relevant issues for schools through  
2445 Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary  
2446 pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found  
2447 here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health](#)  
2448 [education](#).

2449 9.39. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here:  
2450 Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics



2451 and non-statutory implementation guidance. The following resources may also help schools and colleges  
2452 understand and teach about safeguarding:

- 2453 • DfE advice for schools: [teaching online safety in schools](#);
- 2454 • UK Council for Internet Safety (UKCIS)32 guidance: [Education for a connected world](#);
- 2455 • UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with](#)  
2456 [children and young people](#);
- 2457 • The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum  
2458 impact of any online safety sessions delivered by external visitors;
- 2459 • National Crime Agency's CEOP education programme: [Thinkuknow](#);
- 2460 • Public Health England: [Rise Above](#)

2461 9.40. As schools and colleges increasingly work online, it is essential that children are safeguarded from  
2462 potentially harmful and inappropriate online material. Whilst it is essential that governing bodies and  
2463 proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful  
2464 that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with  
2465 regard to online teaching and safeguarding.

#### 2466 Online safety

2467 9.41. It is essential that children are safeguarded from potentially harmful and inappropriate online material.  
2468 An effective whole school and college approach to online safety empowers a school or college to protect  
2469 and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify,  
2470 intervene in, and escalate any concerns where appropriate.

2471 9.42. The breadth of issues classified within online safety is considerable, but can be categorised into four areas  
2472 of risk which we'll refer to as 4Cs later on:

- 2473 • **content:** being exposed to illegal, inappropriate or harmful content, for example:  
2474 pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation  
2475 and extremism.
- 2476 • **contact:** being subjected to harmful online interaction with other users; for example: peer  
2477 to peer pressure, commercial advertising and adults posing as children or young adults with  
2478 the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- 2479 • **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for  
2480 example, making, sending and receiving explicit images (e.g consensual and non-  
2481 consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit  
2482 images and online bullying; and
- 2483 • **commerce** - risks such as online gambling, inappropriate advertising, phishing and or  
2484 financial scams. If you feel your pupils, students or staff are at risk, please report it to the  
2485 Anti-Phishing Working Group <https://apwg.org/>

2486 9.43. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and  
2487 implementing policies and procedures. This will include considering how online safety is reflected as  
2488 required in all relevant policies and considering online safety whilst planning the curriculum, any teacher  
2489 training, the role and responsibilities of the DSL and any parental engagement.

#### 2490 Online safety policy

2491 9.44. Online safety and the school or college’s approach to it should be reflected in the child protection policy.  
2492 Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college  
2493 should have a clear policy on the use of mobile and smart technology. Amongst other things this will  
2494 reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone

2495 networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually  
2496 harass their peers via their mobile and smart technology, share indecent images: consensually and non-  
2497 consensually (often via large chat groups), and view and share pornography and other harmful content.  
2498 Schools and colleges should carefully consider how this is managed on their premises and reflect in their  
2499 mobile and smart technology policy and their child protection policy.

2500 9.45. Information and support available to schools and colleges to keep children safe online can be found in  
2501 [KCSIE 2021 Annex D](#).

## 2502 Remote Learning

2503 9.46. Where children are being asked to learn online at home the Department has provided advice to support  
2504 schools and colleges do so safely: [Schools Covid-19 operational guidance](#) (this covers Remote education)  
2505 and [safeguarding and remote education](#). The NSPCC and PSHE Association also provide helpful advice:

- 2506 • NSPCC Learning - [Undertaking remote teaching safely during school closures](#)
- 2507 • PSHE - [PSHE Association coronavirus hub](#)

## 2508 Filters and monitoring

2509 9.47. Whilst considering their responsibility to safeguard and promote the welfare of children and provide  
2510 them with a safe environment in which to learn, governing bodies and proprietors should be doing all  
2511 that they reasonably can to limit children's exposure to the above risks from the school's or college's IT  
2512 system. As part of this process, governing bodies and proprietors should ensure their school or college  
2513 has appropriate filters and monitoring systems in place. Governing bodies and proprietors should  
2514 consider the age range of their children, the number of children, how often they access the IT system and  
2515 the proportionality of costs vs risks. Schools will work with the internal Cambian/Care tech IT team and  
2516 seek advice and support required.

2517 9.48. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges  
2518 and will be informed in part, by the risk assessment required by the [Prevent Duty](#). The UK Safer Internet  
2519 Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer  
2520 Internet Centre: [appropriate filtering and monitoring](#).

## 2521 Information security and access management

2522 9.49. Education settings are directly responsible for ensuring they have the appropriate level of security  
2523 protection procedures in place, in order to safeguard their systems, staff and learners and review the  
2524 effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.  
2525 Guidance on e-security is available from the National Education Network. In addition, broader guidance  
2526 on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.

## 2527 Reviewing online safety

2528 9.50. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should  
2529 consider carrying out an annual review of their approach to online safety, supported by an annual risk  
2530 assessment that considers and reflects the risks their children face. A free online safety self-review tool  
2531 for schools can be found via the [360 safe website](#).

2532 9.51. UKCIS has published [Online safety in schools and colleges: Questions from the governing board](#). The  
2533 questions can be used to gain a basic understanding of the current approach to keeping children safe  
2534 online; learn how to improve this approach where appropriate; and find out about tools which can be  
2535 used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of

2536 trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development  
2537 and monitoring.

#### 2538 Information and support

2539 9.52. There is a wealth of additional information available to support schools, colleges and parents to keep  
2540 children safe online. A sample is provided at [Annex D](#) (page 152 – 154).

#### 2541 Cyberbullying

2542 9.53. Central to Anti-bullying policy is the principle that ‘bullying is always unacceptable’ and that ‘all  
2543 children/young people have a right not to be bullied’. School/colleges also recognises that it must take  
2544 note of bullying perpetrated outside school/college which spills over into the school/college; therefore  
2545 once aware services will respond to any cyber-bullying we become aware of carried out by  
2546 children/young people when they are away from the site.

2547 9.54. Cyber-bullying is defined as ‘an aggressive, intentional act carried out by a group or individual using  
2548 electronic forms of contact repeatedly over time against a victim who cannot easily defend  
2549 himself/herself.’

2550 • By cyber-bullying, we mean bullying by electronic media:

2551 • Bullying by texts or messages or calls on mobile ‘phones

2552 • The use of mobile ‘phone cameras to cause distress, fear or humiliation

2553 • Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs,  
2554 personal websites, social networking sites

2555 • Using e-mail to message others

2556 • Hijacking/cloning e-mail accounts

2557 • Making threatening, abusive, defamatory or humiliating remarks in on-line forums

2558 9.55. Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory  
2559 information in any media including internet sites.

2560 9.56. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public  
2561 electronic communications network, a message or other matter that is grossly offensive or one of an  
2562 indecent, obscene or menacing character.

2563 9.57. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct  
2564 amounting to harassment.

2565 9.58. If services become aware of any incidents of cyberbullying, they will need to consider each case  
2566 individually as to any criminal act that may have been committed. The services will pass on information  
2567 to the police if it feels that it is appropriate or is required to do so.

#### 2568 Gaming – raising awareness

2569 9.59. Online gaming is an activity in which the majority of children and young people and many adults get  
2570 involved. The services will raise awareness by talking to children/young people/key workers/staff and  
2571 also where appropriate parents/carers involved about the games their children play and help them  
2572 identify whether they are appropriate.

#### 2573 Nudes/semi nudes’ images or videos

2574 9.60. Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others,  
2575 or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any

2576 device that enables the sharing of media and messages. Sexting may also be called: trading nudes, dirties,  
2577 pic for pic.

2578 9.61. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the  
2579 person doing it is a child. A young person is breaking the law if they:

2580 • Take an explicit photo or video of themselves or a friend

2581 • Share an explicit image or video of a child, even if it's shared between children of the same age

2582 • Possess, download or store an explicit image or video of a child, even if the child gave their permission  
2583 for it to be created.

2584 9.62. However, if a young person is found creating or sharing images, the police can choose to record that a  
2585 crime has been committed but that taking formal action isn't in the public interest. There are many  
2586 reasons why a young person may want to send a naked or semi-naked picture, video or message to  
2587 someone else:

2588 • Joining in because they think that 'everyone is doing it'

2589 • Boosting their self-esteem

2590 • Flirting with others and testing their sexual identity

2591 • Exploring their sexual feelings

2592 • o get attention and connect with new people on social media

2593 • they may find it difficult to say no if somebody asks them for an explicit image, especially if the person  
2594 asking is persistent

2595 9.63. The risks of sexting are that the young person has no control over the images and how these are shared,  
2596 and the subsequent risks of blackmail, bullying and harm. In response to this Cambian Group will provide  
2597 education and guidance to prevent individuals from becoming victims of such situations by encouraging  
2598 them to think about the risk of sexting and understand how to seek help when approached to take part  
2599 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)  
2600 [nudes](https://www.cambian.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes).

## 2601 Online reputation

2602 9.64. Online reputation is the opinion others get of a person when they encounter them on-line. It is formed  
2603 by posts, photos that have been uploaded and comments made by others on people's profiles. It is  
2604 important that children/young people and staff are aware that anything that is posted could influence  
2605 their future professional reputation. The majority of organisations and work establishments now check  
2606 digital footprint before considering applications for positions or places on courses.

## 2607 Grooming

2608 9.65. On-line grooming is the process by which one person with an inappropriate sexual interest in  
2609 children/young people will approach a child/young person on-line, with the intention of developing a

2610 relationship with that child/young person, to be able to meet them in person and intentionally cause  
2611 harm.

2612 9.66. The services will build awareness amongst children/young people, parents/carers and staff about  
2613 ensuring that the child/young person:

2614 • Only has friends on-line that they know in real life

2615 • Is aware that if they communicate with somebody that they have met on-line, that relationship should  
2616 stay on-line.

2617 9.67. Where appropriate that the services will support parents/carers to:

2618 • Recognise the signs of grooming

2619 • Have regular conversations with their children/young people about on-line activity and how to stay  
2620 safe on-line

2621 9.68. Where appropriate the services will raise awareness by:

2622 • Regular communication with the families

2623 • Schools/colleges will include awareness around grooming as part of their curriculum

2624 • Identifying with the families and children/young people how they can be safeguarded against  
2625 grooming.

## 2626 **Violence against women and girls (VAWG)**

2627 9.69. Violence against women and girls (VAWG) is a hate crime and a violation of the Human Rights of women  
2628 and girls. The government has a strategy looking at specific issues that women and girls face.

2629 9.70. It is also one of the most oppressive forms of gender inequality and stands as a fundamental barrier to  
2630 equal participation of women and men in social, economic, and political spheres. Such violence impedes  
2631 gender equality and the achievement of a range of development outcomes. VAWG is a complex and  
2632 multifaceted problem that cannot effectively be addressed from a single vantage point. The prevention  
2633 of and response to such violence require coordinated action across multiple sectors.  
2634

## 2635 **Female genital mutilation (FGM)**

2636 9.71. FGM comprises all procedures involving partial or total removal of the external female genitalia or other  
2637 injury to the female genital organs for non-medical reasons, hence interferes with the natural function of  
2638 girls' and women's bodies. It has no health benefits and harms girls and women in many ways.

2639 9.72. The age at which girls undergo FGM varies enormously according to the community in which they live.  
2640 The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before  
2641 marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place  
2642 between the ages of 5 to 8 years and therefore girls within that age bracket are at a higher risk.

2643 9.73. In 2003 FGM became a criminal offence for UK nationals or permanent UK residents to take their child  
2644 abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty  
2645 of 14 years in prison. It is mandatory for teachers to report known cases of FGM to the police.

## 2646 **Forced marriage**

2647 9.74. In the case of children and young people: 'a forced marriage is a marriage in which one or both spouses  
2648 cannot consent to the marriage and duress is involved. Duress can include physical, psychological,

2649 financial, sexual and emotional pressure.’ In developing countries approx. 11% of girls are married before  
2650 the age of 15. One in 3 victims of forced marriage in the UK are under 18 years old.

2651 9.75. It is important that all members of staff recognise the presenting symptoms, know how to respond if  
2652 there are concerns and where to turn for advice.

2653 9.76. Advice and help can be obtained nationally through the **Forced Marriage Unit on +44 (0) 20 7008 0151**  
2654 and locally through the local police safeguarding team or children’s social care.

2655 9.77. While all members of staff (education, care, clinical) have important responsibilities with regard to  
2656 children, young people or adults who may be at risk of forced marriage, managers and leaders should not  
2657 undertake roles in this regard that are most appropriately discharged by other children’s services  
2658 professionals such as police officers or social workers.

#### 2659 **Breast ironing**

2660 9.78. Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's  
2661 breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically  
2662 carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and  
2663 rape, to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue  
2664 education rather than be forced into early marriage. It is mostly practiced in parts of Cameroon, where  
2665 boys and men may think that girls whose breasts have begun to grow are ready for sex. Some reports  
2666 suggest that it has spread to the Cameroonian diaspora, for example to Britain. The most widely used  
2667 implement for breast ironing is a wooden pestle normally used for pounding tubers.

2668 9.79. Any suspected cases of breast ironing **MUST** be reported immediately under this Child Protection and  
2669 Safeguarding policy and the Individual offered medical help.

#### 2670 **Teenage relationship abuse**

2671 9.80. Research has shown that teenagers don’t readily understand what constitutes abusive behaviour such as  
2672 controlling behaviours, which can escalate to physical abuse, e.g. checking someone's phone, telling them  
2673 what to wear, who they can/can't see or speak to and that this abuse is prevalent within teen  
2674 relationships.

2675 9.81. Further research shows that teenagers don’t understand what consent means within their relationships.  
2676 They often hold the common misconception that rape can only be committed by a stranger down a dark  
2677 alley and don’t understand that it could happen within their own relationships. This can lead to these  
2678 abusive behaviours feeling ‘normal’ and therefore unchallenged as they are not recognised as being  
2679 ‘abusive’.

2680 9.82. Vulnerable Individuals may struggle to understand such concepts and the potential consequences of their  
2681 own, their peers or others behaviour towards them. Therefore significant effort will be made to raise  
2682 awareness of it and respond effectively to such situations.

2683 9.83. In response to this Cambian Group will provide education and guidance to prevent teenagers from  
2684 becoming victims and perpetrators of abusive relationships - encouraging them to rethink their views of  
2685 violence, abuse and controlling behaviours, and understand what consent means within relationships.

#### 2686 **Honour-based violence**

2687 9.84. It is often linked to family members or acquaintances who mistakenly believe someone has brought  
2688 shame to their family or community by doing something that is not in keeping with the traditional beliefs  
2689 of their culture. However, abuse committed in the context of preserving “honour” often involves a wider  
2690 network of family or community pressure and can include multiple perpetrators. It is important to be



2691 aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take”  
2692 for example, honour-based violence might be committed against individuals who:

- 2693 • Become involved with a boyfriend or girlfriend from a different culture or religion
- 2694 • Want to get out of an arranged marriage
- 2695 • Want to get out of a forced marriage
- 2696 • Wear clothes or take part in activities that might not be considered traditional within a particular  
2697 culture.

2698 9.85. Girls and women are the most common victims of honour-based violence however it can also affect men  
2699 and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’  
2700 might include: domestic abuse, threats of violence, assault, sexual or psychological abuse, forced  
2701 marriage, being held against their will or taken somewhere they don’t want to go.

2702 9.86. If staff believe that the Individual is at risk from honour-based violence the DSL will follow the usual  
2703 safeguarding referral process. However, if it is clear that a crime has been committed or the Individual is  
2704 at immediate risk the police will be contacted in the first place, this is a mandatory duty placed on  
2705 teachers. It is important that if honour-based violence is known or suspected, communities and family  
2706 members must NOT be contacted prior to referral to the police or social care as this could increase the  
2707 risk to the individual.

#### 2708 Preventing extremism and radicalisation

2709 9.87. All staff are fully aware of their duty in assessing the risk of Individuals being drawn into terrorism  
2710 including support for terrorism ideology and extremist ideas. In accordance with our **026. Preventing**  
2711 **Extremism and Radicalisation policy** and **0.27 E-safety policy** we all need to be vigilant in ensuring the  
2712 safety from extremist and terrorist material when accessing the internet. We take into account erscb  
2713 Local Authority Safeguarding Children’s Board arrangements to fulfil its Prevent duties.

2714 9.88. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other  
2715 forms of harms and abuse, protecting children from this risk should be a part of a schools’ or colleges’  
2716 safeguarding approach.

- 2717 • **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the  
2718 rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.  
2719 This also includes calling for the death of members of the armed forces.

- 2720 • **Radicalisation** refers to the process by which a person comes to support terrorism and extremist  
2721 ideologies associated with terrorist groups.

- 2722 • **Terrorism** is an action that endangers or causes serious violence to a person/people; causes  
2723 serious damage to property; or seriously interferes or disrupts an electronic system. The use or  
2724 threat **must** be designed to influence the government or to intimidate the public and is made  
2725 for the purpose of advancing a political, religious or ideological cause.

2726 9.89. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.  
2727 Background factors combined with specific influences such as family and friends may contribute to a  
2728 child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social  
2729 media or the internet) and settings (such as within the home).

2730 9.90. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent  
2731 those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to  
2732 changes in children’s behaviour, which could indicate that they may be in need of help or protection.



2733 Staff should use their judgement in identifying children who might be at risk of radicalisation and act  
2734 proportionately which may include making a Prevent referral.

2735 9.91. The school's or college's DSL (and any deputies) should be aware of local procedures for making a Prevent  
2736 referral

2737 9.92. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act  
2738 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent  
2739 people from being drawn into terrorism". This duty is known as **the Prevent duty**.

2740 9.93. [An online general awareness training module on Channel is available](#). The module is suitable for school  
2741 staff and other front-line workers. It provides an introduction to the topics covered by this advice,  
2742 including how to identify factors that can make people vulnerable to radicalisation, and case studies  
2743 illustrating the types of intervention that may be appropriate, in addition to Channel.

#### 2744 **Prevent Duty**

2745 9.94. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. DSLs  
2746 and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance:  
2747 for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and  
2748 also covers childcare). DSLs and other senior leaders in colleges should familiar themselves with the  
2749 [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out  
2750 in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

2751 9.95. Local authorities will be expected to ensure appropriate frontline staff, including those of it's contractors,  
2752 have a good understanding of Prevent are trained to recognise vulnerability to being drawn into terrorism  
2753 and are aware of available programmes to deal with this issue.

2754 9.96. As the independent body responsible for standards and quality improvement for further education, the  
2755 Education and Training Foundation will work with the sector to ensure that appropriate training is  
2756 available. This will include and draw from training provided through the network of Prevent co-  
2757 ordinators.

#### 2758 **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

2759 9.97. This section of the policy must be read in conjunction with our 0.29 Child Sexual Exploitation policy.

2760 9.98. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an  
2761 imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity,  
2762 in exchange for something the victim needs or wants, and/or for the financial advantage or increased  
2763 status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can  
2764 affect children, both male and female and can include children who have been moved (commonly  
2765 referred to as trafficking) for the purpose of exploitation.

#### 2766 **Child Criminal Exploitation (CCE)**

2767 9.99. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or  
2768 money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be  
2769 forced or manipulated into committing vehicle crime or threatening/committing serious violence to  
2770 others. Children can become trapped by this type of exploitation as perpetrators can threaten victims  
2771 (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying  
2772 weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As  
2773 children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims  
2774 is not always recognised by adults and professionals, (particularly older children), and they are not  
2775 treated as victims despite the harm they have experienced. They may still have been criminally exploited  
2776 even if the activity appears to be something they have agreed or consented to.

2777 9.100. It is important to note that the experience of girls who are criminally exploited can be very different to  
2778 that of boys. The indicators may not be the same, however professionals should be aware that girls are

2779 at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally  
2780 exploited may be at higher risk of sexual exploitation.

2781 **Child Sexual Exploitation (CSE)**

2782 9.101. CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by  
2783 penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing,  
2784 and touching outside clothing. It may include noncontact activities, such as involving children in the  
2785 production of sexual images, forcing children to look at sexual images or watch sexual activities,  
2786 encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for  
2787 abuse including via the internet.

2788 9.102. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate  
2789 knowledge e.g. through others sharing videos or images of them on social media.

2790 9.103. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17  
2791 year olds who can legally consent to have sex. Some children may not realise they are being exploited  
2792 e.g. they believe they are in a genuine romantic relationship

2793 9.104. Children with learning difficulties can be particularly vulnerable to exploitation as can children from  
2794 particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual  
2795 emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who  
2796 go missing from home or school, children involved in crime, children with parents/carers who have  
2797 mental health problems, learning difficulties/other issues, children who associate with other children  
2798 involved in exploitation. However, it is important to recognise that any child can be targeted.

2799 9.105. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors  
2800 including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or  
2801 other resources. In some cases, the abuse will be in exchange for something the victim needs or wants  
2802 and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or  
2803 facilitator.

2804 9.106. The abuse can be perpetrated by individuals or groups, males or females, and children (under the age of  
2805 18 years, including 16 and 17 year olds who can legally consent to have sex) or adults. It is critical to know  
2806 that children/young people may also be exploited by other children/young people, who themselves may  
2807 be experiencing exploitation – where this is the case, it is important that the child/young person  
2808 perpetrator is also recognised as a victim.

2809 9.107. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic  
2810 to complex organised abuse. It can involve force and/or enticement-based methods of compliance and  
2811 may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when  
2812 activity appears consensual and it should be noted exploitation as well as being physical can be facilitated  
2813 and/or take place online. More information include definitions and indicators are included in - [KCSIE2021](#)

2814 - Part One. Some of the following can be indicators of both child criminal and sexual exploitation where  
2815 children:

- 2816 • Appear with unexplained gifts or new professions;
- 2817 • Associate with other young people involved in exploitation;
- 2818 • Suffer from changes in emotional well-being;
- 2819 • Misuse drugs and alcohol;
- 2820 • Go missing for periods of time or regularly or come home late; and
- 2821 • Regularly miss school or education or do not take part in education.

2822

2823 9.108. Some additional specific indicators that may be present in CSE and children who:

- 2824 • Children who have older boyfriends or girlfriends; and
- 2825 • Children who suffer from sexually transmitted infections, display sexual behaviours beyond expected  
2826 sexual development or become pregnant.

2827 9.109. Further information on signs of a child's involvement in sexual exploitation is available in Home Office  
2828 guidance: Child sexual exploitation: guide for practitioners.

2829 9.110. As an organisation we do recognise that the same level of exploitation may take place involving  
2830 vulnerable young people/adults at risk above the age of 18. An adult at risk is any person who is aged 18  
2831 years or over and at risk of abuse or neglect because of their needs for care and/or support (The Care Act  
2832 2014). As we do provide services for vulnerable young people/adults at risk, therefore it is expected that  
2833 the above statement will equally apply to those who are 18+ across England and Wales.

2834 9.111. Children under the age of criminal responsibility (under the age of 10), or young people who have  
2835 increased vulnerability due to push and pull factors who are manipulated, coerced or forced into criminal  
2836 activity provide opportunity for criminals to distance themselves from crime.

## 2837 County Lines

2838 9.112. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal  
2839 drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as  
2840 well as across the UK - no specified distance of travel is required. Children and vulnerable adults are  
2841 exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation,  
2842 violence (including sexual violence) and weapons to ensure compliance of victims. Children can be  
2843 targeted and recruited. Exploitation is an integral part of the county lines, children may become victims  
2844 through: coercion, intimidation, violence (including sexual) and weapons.

2845 9.113. Children can be targeted and recruited into county lines in a number of locations including schools,  
2846 further and higher educational institutions, pupil referral units, special educational needs schools,  
2847 children's homes and care homes. Children are often recruited to move drugs and money between  
2848 locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed  
2849 internally to avoid detection. Children can easily become trapped by this type of exploitation as county  
2850 lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their  
2851 families) if they attempt to leave the county lines network.

2852 9.114. Children are also increasingly being targeted and recruited online using social media. Children can easily  
2853 become trapped by this type of exploitation as county lines gangs can manufacture drug debts which  
2854 need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they  
2855 attempt to leave the county lines network. These children and young people are at serious risk of  
2856 criminalisation, sexual exploitation and exposure to violence. This is facilitated by a group who may not

2857 necessarily be affiliated to a gang, but who have developed networks across geographical boundaries to  
2858 access and exploit existing drugs markets in these areas.

2859 9.115. The group, or individuals exploited by them, travel regularly between the urban hub and the rural  
2860 marketplace, to replenish stock and deliver cash. This movement is not unique to county lines drug supply  
2861 but is generally more frequent and in smaller deal amounts compared to most other drug supply  
2862 methods.

2863 9.116. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are  
2864 involved in county lines. Some additional specific indicators that may be present where a child is  
2865 criminally exploited through involvement in county lines are children who:

- 2866 • Go missing and are subsequently found in areas away from their home;
- 2867 • Have been the victim or perpetrator of serious violence (e.g. knife crime);
- 2868 • Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and  
2869 collecting money for drugs;
- 2870 • Are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid  
2871 detection;
- 2872 • Are found in accommodation that they have no connection with, often called a 'trap house or  
2873 cuckooing' or hotel room where there is drug activity;
- 2874 • Owe a 'debt bond' to their exploiters;
- 2875 • Have their bank accounts used to facilitate drug dealing.

2876 9.117. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be  
2877 considered alongside consideration of availability of local services/third sector providers who offer  
2878 support to victims of county lines exploitation.

#### 2879 Cuckooing

2880 9.118. This is the exploitation of young people that might be vulnerable is a common feature in the facilitation  
2881 of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to  
2882 secure the use of dwellings held by vulnerable people in the rural marketplace - commonly referred to as  
2883 cuckooing.

2884 9.119. Cuckooing is a form of crime in which drug dealers take over the home of a vulnerable person in order to  
2885 use it as a base for drug dealing. As of the 2010s, cuckooing is becoming an increasingly common problem

2886 in the South of England. The crime is named for the cuckoo's practice of taking over other birds' nests for  
2887 its young.

2888 9.120. The group is inclined to use intimidation, violence and weapons, including knives, corrosives and firearms.

2889 9.121. Additional to the list under Serious Violent Crime section, other indicators that a child may be criminally  
2890 exploited include:

2891 

- Increase in missing episodes (Education and/or Care) – particular key as children/young people can

  
2892 be missing for days and drug run in other counties

2893 

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

2894 

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

2895 

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

2896 

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

2897 

- Increase in aggression, violence and fighting

2898 

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

2899 

- Travel receipts that are unexplained

2900 

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

2901 

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

2902 9.122. We will treat any child/young person who may be criminally exploited as a victim in the first instance and  
2903 refer to the East Riding safeguarding board in the first instance. If a referral to the police is also required  
2904 as crimes have been committed on the school premises, these will also be made.

#### 2905 Knife crime

2906 9.123. Ofsted report [Knife crime safeguarding children and young people \(Lessons from London\)](#) makes  
2907 references to both; to the use of knives against children either to threaten or to wound them and to  
2908 instances when children may have been carrying or using knives for a range of purposes.

2909 9.124. Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and  
2910 knife-carrying. However, there are many different criminal offences relating to knives. For example:

- 2911
  - It is an offence to threaten or cause harm to a person with a bladed weapon
- 2912
  - Some bladed weapons are prohibited from being sold or purchased, including to anyone  
2913 under the age of 18
- 2914
  - Offences such as robbery or assault can be aggravated if a knife is involved
- 2915
  - It is also an offence to carry a knife in a public place without good reason.
- 2916
  - It is clear that knife crime is an increasing safeguarding risk to children and young people,  
2917 both at school and in their local communities. While Ofsted have not sought to answer the  
2918 question of the causes of knife crime, leaders told Ofsted that, in their experience, children  
2919 are in three categories of risk of knife-carrying.

2920 9.125. The highest level of risk is for those children who have been groomed into gangs, for the purposes of  
2921 criminal exploitation.

2922 9.126. Underneath this lies a group of children who have witnessed other children carrying knives, have been  
2923 the victim of knife crime or know someone who has carried a knife for protection or status-acquisition or

2924 who are encouraged to believe knife-carrying is normal through the glamorisation of gangs and knives on  
2925 social media.

2926 9.127. Then there are children who carry knives to school as an isolated incident. For example, they may carry  
2927 a penknife that a grandparent has gifted them

2928 9.128. It is important to remember that knife crime does not exist in a vacuum and children who are victims or  
2929 perpetrators may also be experiencing multiple vulnerabilities.

2930 9.129. Some children and young people can be more at risk of being drawn into criminality, multiple studies  
2931 demonstrate a clear link between inequality and high rates of violence for example. There is a need to  
2932 both understand and address individual risk factors as well as address the social challenges that underpin  
2933 criminal exploitation and serious violence in our communities, from poor mental health, addiction,  
2934 poverty, unemployment and poor-quality housing.

### 2935 **Missing young people and the link between missing and county lines**

2936 9.130. Every precaution is taken through the use of risk assessments and thorough planning and supervision to  
2937 ensure that children, young people and young adults are safe both at school, college, home, and on  
2938 outings. If a child, young person or young adult goes missing from our Location it is considered a potential  
2939 indicator of abuse or neglect.

2940 9.131. Our staff members must follow our **0.23. Missing from Care and Education policy** in the event of  
2941 someone going missing. All homes/schools/colleges must inform the LA of any student who fails to attend  
2942 school regularly or has been absent without the school's permission for a continuous period of 10 days  
2943 or more or as such intervals agreed with the Local Authority. It is essential that all staff are alert to signs  
2944 such as travelling to conflict zones, FGM and forced marriage.

2945 9.132. Coercion and manipulation often increase a young person's vulnerability to exploitation, pushing them  
2946 towards going missing and becoming involved in criminal activities. Some individuals may be pulled  
2947 towards exploitation through the promise of money, gifts, affection and status. However, they may be  
2948 then be forced to work for these people as they are coerced into believing that they are indebted to  
2949 them.

### 2950 **Domestic abuse**

2951 9.133. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever  
2952 statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as  
2953 victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of  
2954 domestic abuse, based on the previous cross-government definition, ensures that different types of  
2955 relationships are captured, including ex-partners and family members. The definition captures a range of  
2956 different abusive behaviours, including physical, emotional and economic abuse and coercive and  
2957 controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the  
2958 behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as  
2959 defined in section 2 of the 2021 Act).

2960 9.134. Types of domestic abuse include intimate partner violence, abuse by family members, teenage  
2961 relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of  
2962 domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and  
2963 domestic abuse can take place inside or outside of the home. The government will issue statutory  
2964 guidance to provide further information for those working with domestic abuse victims and perpetrators,  
2965 including the impact on children.

2966 9.135. All children can witness and be adversely affected by domestic abuse in the context of their home life  
2967 where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence  
2968 can have a serious, long lasting emotional and psychological impact on children. In some cases, a child  
2969 may blame themselves for the abuse or may have had to leave the family home as a result.

2970 9.136. Young people can also experience domestic abuse within their own intimate relationships. This form of  
2971 peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of  
2972 the young people, this may not be recognised in law under the statutory definition of 'domestic abuse'



2973 (if one or both parties are under 16). However, as with any child under 18, where there are concerns  
2974 about safety or welfare, child safeguarding procedures should be followed and both young victims and  
2975 young perpetrators should be offered support. The Act's provisions, including the new definition, will be  
2976 commenced over the coming months.

2977 9.137. [Operation Encompass](#) operates in all police forces across England. It helps police and schools work  
2978 together to provide emotional and practical help to children. The system ensures that when police are  
2979 called to an incident of domestic abuse, where there are children in the household who have experienced  
2980 the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or  
2981 children arrive at school the following day. This ensures that the school has up to date relevant  
2982 information about the child's circumstances and can enable immediate support to be put in place,  
2983 according to the child's needs. Operation Encompass does not replace statutory safeguarding  
2984 procedures. Where appropriate, the police and/or schools should make a referral to children's social care  
2985 if they are concerned about a child's welfare. More information about the scheme and how schools can  
2986 become involved is available on the Operation Encompass website.

2987 9.138. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence,  
2988 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well  
2989 as those who are worried about friends and loved ones. It also has a form through which a safe time from  
2990 the team for a call can be booked. Additional advice on identifying children who are affected by domestic  
2991 abuse and how they can be helped is available at:

- 2992 • [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- 2993 • [Refuge what is domestic violence/effects of domestic violence on children](#)
- 2994 • [Saflives: young people and domestic abuse](#).
- 2995 • [Domestic abuse: specialist sources of support - GOV.UK](#) (www.gov.uk) (includes  
2996 information for adult victims, young people facing abuse in their own relationships and  
2997 parents experiencing child to parent violence/abuse)
- 2998 • Home : [Operation Encompass](#) (includes information for schools on the impact of domestic  
2999 abuse on children)

## 3000 Serious Violent Crime

3001 9.139. All staff should be aware of indicators, which may signal that children are at risk from, or are involved  
3002 with serious violent crime. These may include:

- 3003 • Increased absence from school with a significant decline in performance,
- 3004 • A change in friendships or relationships with older individuals or group,
- 3005 • Signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries,
- 3006 • Unexplained gifts or new possessions could also indicate that children have been approached by, or  
3007 are involved with individuals associated with criminal networks or gangs.

3008 9.140. All staff should be aware of the associated risks and understand the measures in place to measure these.  
3009 Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang



3010 involvement and its [criminal exploitation of children and vulnerable adults: County Lines guidance -](#)  
3011 [September 2018](#).

## 3012 Mental Health

3013 9.141. Schools, colleges and homes have an important role to play in supporting the mental health and wellbeing  
3014 of young people. All staff should be aware that mental health problems can, in some cases, be an indicator  
3015 that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

3016 9.142. Schools/colleges and homes need to ensure they have clear systems and processes in place for identifying  
3017 possible mental health problems, including routes to escalate and clear referral and accountability  
3018 systems.

3019 9.143. The Department is providing funding to support costs of a significant training program for senior mental  
3020 health leads and the national rollout of the [Link Program](#). Training for senior mental health leads, will be  
3021 available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school  
3022 or college approach to mental health.

3023 9.144. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.  
3024 Staff however, are well placed to observe children day-to-day and identify those whose behaviour  
3025 suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff  
3026 suspect this might be the case they should report their concerns to a senior leader within the school and  
3027 if possible bring their concerns to a member of the clinical team.

3028 9.145. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood  
3029 experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is  
3030 key that staff receive appropriate education and training so that they are aware of how these children's  
3031 experiences, can impact on their mental health, behaviour and education.

3032 9.146. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action  
3033 should be taken. Staff should follow their child protection policy and speak immediately to the DSL or a  
3034 deputy.

3035 9.147. Schools and colleges can access a range of advice to help them identify children in need of extra mental  
3036 health support, this includes working with external agencies. More information can be found in the  
3037 [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best  
3038 practice. Public Health England has produced a range of resources to support secondary school teachers  
3039 to promote positive health, wellbeing and resilience among children.

3040 9.148. The DfE has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful  
3041 for colleges). The [Promoting and supporting mental health and wellbeing in Schools](#) sets out how schools  
3042 and colleges can help prevent mental health problems by promoting resilience as part of an integrated,  
3043 whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their  
3044 pupils.

3045 9.149. In addition, Public Health England has produced a range of resources to support secondary schools to  
3046 promote positive health, wellbeing and resilience among children including its guidance Promoting  
3047 children and young people's emotional health and wellbeing. Its resources include social media, forming  
3048 positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The  
3049 Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff  
3050 with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our

3051 [Wellbeing for education recovery program](#) content, which covers issues such as bereavement, loss,  
3052 anxiety, stress and trauma.

### 3053 **Human trafficking**

3054 9.150. Human trafficking is defined by the UNHCR in respect of children/young people/young adults as a process  
3055 that is a combination of:

- 3056 - Movement (including within the UK);
- 3057 - Control, through harm / threat of harm or fraud
- 3058 - For the purpose of exploitation

3059 9.151. Traffickers and slave drivers trick, force and/or persuade individuals to leave their homes. Grooming  
3060 methods are used to gain the trust of a person first, e.g. the promise of a better life, which results in a  
3061 life of abuse, servitude and inhumane treatment.

3062 9.152. Any individual transported for exploitative reasons is considered to be a trafficking victim. There is  
3063 significant evidence that children/young people/young adults (both of UK and other citizenship) are  
3064 being trafficked internally within the UK and this is regarded as a more common form of trafficking in  
3065 the UK.

3066 9.153. There are a number of indicators which suggest that a child/young person/young adult may have been  
3067 trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as  
3068 follows:

- 3069 - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has  
3070 an unwanted pregnancy
- 3071 - Has a history with missing links and unexplained moves
- 3072 - Is required to earn a minimum amount of money every day
- 3073 - Works in various locations
- 3074 - Has limited freedom of movement
- 3075 - Appears to be missing for periods
- 3076 - Is known to beg for money
- 3077 - Is being cared for by adult/s who are not their parents and the quality of the relationship between  
3078 the child and their adult carers is not good
- 3079 - Is one among a number of unrelated children found at one address
- 3080 - Has not been registered with or attended a GP practice
- 3081 - Is excessively afraid of being deported.

3082 9.154. For those children/young people/young adults who are internally trafficked within the UK indicators  
3083 include:

- 3084 - Physical symptoms (bruising indicating either physical or sexual assault)
- 3085 - Prevalence of a sexually transmitted infection or unwanted pregnancy
- 3086 - Reports from reliable sources suggesting the likelihood of involvement in
- 3087 - Sexual exploitation / the child has been seen in places known to be used for sexual exploitation
- 3088 - Evidence of drug, alcohol or substance misuse

- 3089 - Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing
- 3090 - from older people
- 3091 - Relationship with a significantly older partner
- 3092 - Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible
- 3093 - explanation of the source of necessary funding
- 3094 - Persistently missing, staying out overnight or returning late with no plausible explanation
- 3095 - Returning after having been missing, looking well cared for despite having not been at home
- 3096 - Having keys to premises other than those known about
- 3097 - Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating
- 3098 - disorder, promiscuity
- 3099 - Truancy / disengagement with education
- 3100 - Entering or leaving vehicles driven by unknown adults
- 3101 - Going missing and being found in areas where the child/young person/young adult has no known
- 3102 - links; and/or
- 3103 - Possible inappropriate use of the internet and forming on-line relationships, particularly with
- 3104 - adults/other adults.

3105 9.155. These behaviours themselves do not indicate that an Individual is being trafficked, but should be  
3106 considered as indicators that this may be the case.

#### 3107 **Modern slavery and the National Referral Mechanism**

3108 9.156. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.  
3109 Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced  
3110 criminality and the removal of organs.

3111 9.157. When considering modern slavery, there is a perception that this is taking place overseas. The  
3112 government estimates that tens of thousands of slaves are in the UK today.

3113 9.158. Young people are being forced to work in restaurants, nail bars, car washes and harvesting fruit,  
3114 vegetables or other foods have all been slaves 'hiding in plain sight' within the U.K and rescued from  
3115 slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been  
3116 rescued within the UK.

3117 9.159. If staff believe that a child/young person/young adult is being trafficked or is a slave, this must be  
3118 reported to the DSL/RM/Head of Service for referral to be considered to local Safeguarding Authority.

3119 9.160. Further information on the signs that someone may be a victim of modern slavery, the support available  
3120 to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.  
3121 Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

#### 3122 **Cybercrime**

3123 9.161. Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised  
3124 as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line)

3125 or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes  
3126 include:

- 3127 • Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer  
3128 network to look for test paper answers or change grades awarded;
- 3129 • Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer,  
3130 network or website unavailable by overwhelming it with internet traffic from multiple sources;  
3131 and
- 3132 • Making, supplying or obtaining malware (malicious software) such as viruses, spyware,  
3133 ransomware, botnets and Remote Access Trojans with the intent to commit further offence,  
3134 including those above.

3135 9.162. Children with particular skill and interest in computing and technology may inadvertently or  
3136 deliberately stray into cyber-dependent crime.

3137 9.163. If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the  
3138 Cyber Choices programme. This is a nationwide police programme supported by the Home Office and  
3139 led by the National Crime Agency, working with regional and local policing. It aims to intervene where  
3140 young people are at risk of committing, or being drawn into, low level cyber-dependent offences and  
3141 divert them to a more positive use of their skills and interests.

3142 9.164. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of  
3143 illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line  
3144 bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to](#)  
3145 [call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

#### 3146 **Initiation/Hazing**

3147 9.165. Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a  
3148 private school, sports team etc. There are a number of different forms, from relatively mild rituals to  
3149 severe and sometimes violent ceremonies in gangs/criminal groups.

3150 9.166. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which  
3151 promote a bond between them. After the hazing is over, the newcomers also have something in common  
3152 with older members of the organisation, because they all experienced it as part of a rite of passage. Many  
3153 rituals involve humiliation, embarrassment, abuse, and harassment.

3154 9.167. Cambian Group will provide education to prevent individuals from becoming victims of such behaviour  
3155 and raise awareness of such within all services.  
3156

#### 3157 **Safeguarding issues relating to Individual children and young people needs**

##### 3158 **Homelessness**

3159 9.168. As an organisation we recognise that being homeless or being at risk of becoming homeless presents a  
3160 real risk to a child's/young person welfare. The impact of losing a place of safety and security can affect  
3161 an Individual's behaviour and attachments. DSL will work with Local Authorities to raise/progress  
3162 concerns at the earliest opportunity.

3163 9.169. In line with the Homelessness Reduction Act 2017 they will also promote links into the Local Housing  
3164 Authority for the parent/guardians in order to raise/progress concerns.

3165 9.170. In most cases school and college colleagues will be considering homelessness in the context of children  
3166 who live with their families, and intervention will be on that basis. However, it should also be recognised  
3167 in some cases 16 and 17 year olds could be living independently from their parents or guardians, for  
3168 example through their exclusion from the family home, or other reasons. This will require a different level  
3169 of intervention and support. Children's services will be the lead agency for these young people and the  
3170 DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The

3171 department and the Ministry of Housing, Communities and Local Government have published joint  
3172 statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless  
3173 and/or require accommodation: [Homelessness Reduction Act: policy factsheets](#).

3174 9.171. Guidance on how local authorities should exercise their homelessness functions in accordance with the  
3175 Homelessness Reduction Act 2017 from 3 April 2018- [Homelessness code of guidance for local](#)  
3176 [authorities](#).

3177 9.172. Children's services (Adult's services where the person is 18 +) will be the lead agency for these young  
3178 people and the DSL should ensure appropriate referrals are made based on the Individual's  
3179 circumstances.

3180 9.173. It is recognised that whilst referrals and/or discussion with the Local Housing Authority should be  
3181 progressed as appropriate, this does not, and should not, replace a referral into the East Riding  
3182 safeguarding board where an Individual has been harmed or is at risk of harm.

### 3183 **Private Fostering**

3184 9.174. Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be  
3185 cared for by another adult who is not closely related and is not a legal guardian with parental  
3186 responsibility for 28 days or more.

3187 9.175. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister,  
3188 uncle or aunt.

3189 9.176. The Law requires that the carers and parents must notify the Children's Services Department of any  
3190 private fostering arrangement.

3191 9.177. If the school/college/children's home/care homes (16-18) becomes aware that a child/young person is  
3192 being privately fostered they will inform the Children's Services Department and inform both the parents  
3193 and carers that they have done so.

### 3194 **Child and the Court System**

3195 9.178. As an organisation we recognise that children/young people are sometimes required to give evidence in  
3196 criminal courts, either for crimes committed against them or for crimes they have witnessed. We know  
3197 that this can be a stressful experience and therefore services across the organisation will aim to support  
3198 children through this process.

3199 9.179. Along with information, advice and guidance, services will use age-appropriate materials published by  
3200 HM Courts and Tribunals Services (2017) [Going to court](#) explain to children/young people what it means  
3201 to be a witness, how to give evidence and the special measures which are in place to assist such as using  
3202 a live link/aids to communicate and video links.

3203 9.180. We recognise that making child arrangements via the family courts following separation can be stressful  
3204 and entrench conflict in families. This can be very stressful for children. Services will support  
3205 children/young people going through this process.

3206 9.181. Alongside information, advice and guidance services will use online materials published by The Ministry  
3207 of Justice (2018) which offers children/young people information & advice on the dispute resolution

3208 service - [Get help with child arrangements](#). These materials will also be offered to parents and carers if  
3209 appropriate.

3210 9.182. Ensure that children/young people are sufficiently supported where a parent has been sent to prison,  
3211 adequate support includes protection from: stigma, isolation and poor mental health.

3212 **Fabricated or induced illnesses (FII)**

3213 9.183. Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually  
3214 the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

3215 9.184. FII is also known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's  
3216 syndrome, where a person pretends to be ill or causes illness or injury to themselves).

3217 9.185. FII covers a wide range of symptoms and behaviours involving parents seeking healthcare for a child. This  
3218 ranges from extreme neglect (failing to seek medical care) to induced illness.

3219 9.186. Behaviours in FII include a parent/carers who:

- 3220 - Persuades healthcare professionals that their child is ill when they're perfectly healthy,
- 3221 - Exaggerates or lies about their child's symptoms,
- 3222 - Manipulates test results to suggest the presence of illness – for example, by putting glucose in urine
- 3223 samples to suggest the child has diabetes,
- 3224 - Deliberately induces symptoms of illness – for example, by poisoning her child with unnecessary
- 3225 medication or other substances.

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